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

Negative Declaration

3880 Mission Project

Case Number: ENV-2022-6550-ND

Project Location: 3880 North Mission Road (3850-4108 North Mission Road) Los Angeles, CA 90031

Community Plan Area: Northeast Los Angeles

Council District: 14 – Kevin de León

Project Description: The Project Site is located on the east side of Mission Road, between Soto Street to the north and other manufacturing uses to the south in the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan of the City of Los Angeles, in zip code 90031.

The Project would involve the import of approximately 344,000 cubic yards of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial and office buildings (the remainder of the fill will come from on-site sources). Any prior or subsequent development on the site is not a part of this Project.

In order to allow for development of the Project, the Project Applicant is requesting the following discretionary approvals from the City:

1. Haul route for approximately 344,000 cubic yards of imported soil.

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

PREPARED BY:
CAJA Environmental Services, LLC
9410 Topanga Canyon Blvd., Suite 101
Chatsworth, CA 91311

APPLICANT:
Worthe Real Estate Group
100 Wilshire Boulevard, Suite 1600
Santa Monica, CA 90401

June 2023

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Section 1
Introduction

An application for the proposed 3880 Mission Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as the 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/Negative Declaration (IS/ND) evaluates potential environmental effects resulting from the construction, implementation, and operation of the Project. This IS/ND 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 IS/ND, the City has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This IS/ND is intended as informational documents and is ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 Purpose of an Initial Study

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

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

This IS/ND been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.).

1.2 Organization of the Initial Study

This IS/ND is organized into four sections as follows:

Section 1. Introduction: This Section provides introductory information, such as the Project title and the Project Applicant, and identifies the lead agency for the Project.

Section 2. Executive Summary: This Section provides project information, identifies key areas of environmental concern, and includes a determination of whether the project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Project, including project characteristics, related project information, and a list of requested discretionary actions.

Section 4. Evaluation of Environmental Impacts: This Section contains the completed CEQA Initial Study Checklist and a discussion of the environmental factors that would be potentially affected by the Project.

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, an effort 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.

At the onset of the environmental review process, the City has prepared an IS/ND to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the proposed Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein. If this IS/ND and the Project are approved by the City, then within five days of the action, the City will file a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

Section 2
Executive Summary

Project Title	**3880 Mission Project**
Environmental Case No.	ENV-2022-6550-ND
Related Cases	N/A

Project Location	**3880 North Mission Road (**3850-4108 North Mission Road) Los Angeles, CA 90031
Community Plan Area	Northeast Los Angeles
General Plan Designation	Limited Industrial and Commercial Manufacturing
Zoning	M1-1 and CM-1
Council District	14 – Kevin de León

Lead Agency	City of Los Angeles, Department of City Planning
Staff Contact	Trevor Martin, City Planning Associate
Address	200 North Spring Street, Room 763, Los Angeles, CA 90012
Phone Number	213-978-1341
Email	trevor.martin@lacity.org

Applicant	Worthe Real Estate Group
Address	100 Wilshire Boulevard, Suite 1600, Santa Monica, CA 90401
Phone Number	310-393-9653

PROJECT DESCRIPTION

The Project would involve the import of approximately 344,000 cubic yards of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial, and office buildings (the remainder of the fill will come from on-site sources). Any prior or subsequent development on the site is not a part of this Project.

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

ENVIRONMENTAL SETTING

The Project Site is located on the east side of Mission Road, between Soto Street to the north and other manufacturing uses to the south in the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan of the City of Los Angeles (City), in zip code 90031. The Site is located approximately 2.5 miles northeast of Downtown Los Angeles and 17 miles northeast of the Pacific Ocean. The surrounding uses include an auto-repair building to the north, manufacturing, and storage facilities to the south, commercial and residential buildings to the west, and hillside open space to the east. The Site contains several industrial manufacturing buildings and surface parking lots.

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

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

Trevor Martin	City Planning Associate
PRINTED NAME	**TITLE**
Trevor Martin	June 5, 2023
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.

Section 3
Project Description

This section is based on the following items, which are included as **Appendix A** to this ND:

A-1 Truck Routing Staging Plan, Snyder Langston, January 17, 2023

A-2 Related Projects List, Los Angeles Department of Transportation, December 2022

3.1 Environmental Setting

3.1.1 Project Location

The Project Site is located on the east side of Mission Road, between Soto Street to the north and other manufacturing uses to the south in the Lincoln Heights neighborhood of the Northeast Los Angeles Community Plan of the City of Los Angeles (City), in zip code 90031.

The Site is located approximately 2.5 miles northeast of Downtown Los Angeles and 17 miles northeast of the Pacific Ocean.

See **Figure 3-1, Location Map**, for the local area of the Site.

3.1.2 Surrounding Land Uses

North adjacent to the Site is an auto-repair shop (currently G Spot Automotive, 4112 Mission Road). This area is zoned M1-1.

South adjacent to the Site are several manufacturing and storage facilities (3800 Mission Road, 3915-3921 Selig Place) zoned M1-1 and (2153 Soto Street), zoned PF-1.

West adjacent to the Site is a public storage building (4002 Mission Road), zoned M1-1.

West across Mission Road are the following uses (from north to south):

- 2-story commercial building (currently Lincoln Heights Family Recovery Center (4099 Mission), zoned [Q]C2-1.
- 2-story office building and associated 2-story parking structure (currently Los Angeles County Department of Public Social Services, 4077 Mission Road), zoned [Q]C4-1VL.
- 4-story multi-family building (4001 Mission Road), zoned [Q]C4-1VL.
- Car wash (3979 Mission Road), zoned [Q]C2-1.
- 1-story office buildings (3935 Mission Road), zoned [Q]C2-1.
- 2-story multi-family building (3872 Duke Street), zoned R3-1.

Figure 3-1
Location Map

- 4-story multi-family residential buildings (Mission Plaza, 2226-2230 Parkside Avenue) zoned R3-1.

- 1-story commercial building (3851 Mission Road), zoned [Q]C2-1

Southwest across Mission Road is a school (East College Prep Charter School, 3825 Mission Road), zoned [Q]C2-1.

East adjacent to the Site is Soto Street and a hillside with a radio station and antennas (KLAC AM leading to single-family homes along Indian Avenue, zoned [Q]R1-1D.

Sensitive receptors[1] in the area and along the haul route to the nearest freeway include:

- The nearest residential uses:
    - Multi-family buildings (Mission Plaza, 2226-2230 Parkside Avenue), 115 feet northwest of the Site
    - Multi-family buildings (3427-3467 Mission Road), 30 feet northwest of Mission Road haul route
- The nearest schools:
    - East College Prep Charter School (3825 Mission Road), 285 feet southwest of the Site
    - Pueblo De Los Angeles High School (3921 Selig Place), 415 feet south of the Site
    - Lincoln High School (3501 Broadway), 1,100 feet west of the Site
    - Multnomah Elementary School (2101 Indiana Avenue), 915 feet southeast of the Site
- The nearest medical facility:
    - Keck Medicine and Hospital of USC (1500 San Pablo Street), 2,800 feet south of the Site
- The nearest park:
    - Lincoln Park (3501 Valley Boulevard), 900 feet south of the Site.

3.1.3 Regional and Local Access

Regional access is provided by:

- I-5 Freeway (Santa Monica) 1.15 miles southwest of the Site
- I-10 Freeway (San Bernardino), 1.0 mile south of the Site

[1] Residences, board and care facilities, schools, playgrounds, hospitals, parks, childcare centers, and outdoor athletic facilities.

Local access is provided by[2]:

- Mission Road (Boulevard II in the Mobility Plan 2035), adjacent west of the Site
- Soto Street (Avenue I), adjacent east of the Site
- Broadway (Avenue I), west of the Site

3.1.4 Pedestrian Facilities

There is a sidewalk along all the Project Site's west boundary along Mission Road.

Crosswalks are provided at all legs of the nearest signalized intersections (Mission Road / Broadway, west of the Site and Mission Road / Baldwin Street, southwest of the Site.

3.1.5 Bicycle Facilities

The following bicycle facilities are located nearby[3]:

- Bicycle-friendly streets[4]:
    - Broadway, 100 feet west of the Site
- Dedicated bicycle line:
    - Mission Road, adjacent west of the Site

3.1.6 Public Transit

The Site is within a High-Quality Transit Area (HQTA),[5] which are areas within one-half mile of a high-quality transit corridor, which is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.[6]

Los Angeles County Metropolitan Transportation Authority (Metro)[7] operates public transit in the area, as shown in **Table 3-1, Public Transit**.

Table 3-1
Public Transit

2 NavigateLA, Mobility Plan 2035: https://navigatela.lacity.org/navigatela/, accessed November 2, 2022.

3 LADOT Programs: https://ladotlivablestreets.org/programs/active-transportation/maps

4 According to LADOT's Bike Program, Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians. https://ladotbikeblog.wordpress.com/bfs/

5 SCAG, HQTA 2016 based on the 2020-2045 RTP/SCS: https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954, accessed November 2, 2022.

6 SCAG, Connect SoCal, Active Transportation Technical Report, page 26: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_active-transportation.pdf?1606001530, accessed November 2, 2022.

7 Metro System Map: https://www.metro.net/riding/guide/system-maps/, accessed November 2, 2022.

Line	Type	Direction	Stop	Distance to Site	Service
Metro					
78	Bus	North-south on Mission	Broadway	Adjacent to Site	12 minutes
45	Bus	North-south on Mission	Broadway	Adjacent to Site	10 minutes
Metro 78 schedule (Dec. 11, 2022): https://www.metro.net/riding/schedules/?line=78-13167 Metro 45 schedule (Oct. 23, 2022): https://www.metro.net/riding/schedules/?line=45-13167					

3.1.7 Planning and Zoning

Table 3-2, Project Site, lists the Site's APNs, zoning, and General Plan land use designation:[8]

- M1-1 (Limited Industrial zone in Height District 1) and Limited Manufacturing designation
- CM-1 (Commercial Manufacturing zone in Height District 1) and Commercial Manufacturing designation

Table 3-2
Project Site

Address	Lot	APN	Size (sf)	Zone	Land Use
3850, 3880 N. Mission Road	A	5211-019-024	654,181.1	M1-1	Limited Industrial
None	-		563,821.6		
None	-		18,810.6		
4030, 4044, 4050, 4054, 4076, 4080, 4086, 4094, 4108 N. Mission Road	A		62,668.0		
3908 N. Mission Road	-	5211-019-021	22,024.7		
None	-	5211-019-020	9,491.2		
None	-	5211-019-019	17,421.5		
3930 N. Mission Road	-	5211-019-018	26,012.7		
3960, 3970 N. Mission Road	-	5211-019-025	14,446.8		
3972 N. Mission Road	-		9,690.3		
None	-		9,016.8		
None	-	5211-019-026	272,862.8	CM-1	Commercial Manufacturing
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, November 2022.					

The Project Site is located within a Special Grading Area of the Bureau of Engineering (BOE).[9]

The Project Site is located within a liquefaction area.[10]

The Project Site has the following zoning classifications:

- ZI-2129 State Enterprise Zone: East Los Angeles

8 Los Angeles Zoning Summary: https://planning.lacity.org/zoning/regulations-summary

9 http://zimas.lacity.org, accessed November 2, 2022.

10 http://zimas.lacity.org, accessed November 2, 2022.

- ZI-2498 Local Emergency Temporary Regulations - Time Limits and Parking Relief - LAMC 16.02.1

3.2 Existing Conditions

The Site contains several warehouse, logistics, and light industrial buildings and surface parking lots.

3.3 Description Of Project

3.3.1 Project Overview

The Project would involve the import of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial, and office buildings (the remainder of the fill will come from on-site sources). Any prior or subsequent development is not a part of this Project.

3.3.2 Hauling Information

3.3.2.1 Schedule

The import is expected to start in March 2024 and continue for 6 months until September 2024. Current hours of operation will be 7 AM to 5 PM.

3.3.2.2 Soil Import

The import of soil calculations is shown in **Table 3-3.** The import will require 344,000 cubic yards (cy) of soil. Each truckload will have a capacity of 14 cubic yards. This assumes 200 loads a day due to the current high demand for soil export from other construction sites within a 25-mile radius around the Project Site.

Table 3-3
Soil Import Summary

Phase	Soil Amount	Truck Capacity	Loads	Ave. Loads / Day	Working Days
Import	344,000 cy	14 cy	24,572	200	123
Applicant, April 2023.					

3.3.2.3 Donor Sites

Dirt will be imported to the Project Site from area construction sites that are exporting dirt. The potential source donor sites could include:

- 5601 Santa Monica, Los Angeles, CA 90038, approximately 8 miles from the Site
- 2123 Violet Street, Los Angeles, CA 90021, approximately 5 miles from the Site

- 657 N. Robertson West Hollywood, CA 90069, approximately 13 miles from the Site

3.3.2.4 Staging

The Site has a very large footprint which will allow for multiple trucks to be received at the same time, if needed. If staggered import is not preferred, all 344,000 cy will be imported in the 6-month duration (123 workdays).

Dirt truck staging and queuing will occur onsite, in two locations:

- Soto Street parking area on the north side of the Site
- Mission Road parking area on the west central side of the Site

3.3.2.5 Route

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes will comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. These streets are part of different approved haul routes.[11]

To account for possible variations in the route and the possibility of other donor sites, the analysis will assume 25 miles one-way (50 miles round-trip) truck distance as a conservative worst-case scenario, and could include the following:

- Full trucks: exit the donor site and travel on City streets to the US-101 Freeway South, exit Mission Road and travel northeast on Mission Road to the Project Site queuing/staging areas to offset the load.
- Empty trucks:
    - Route 1: Exit Site on Mission Road and travel southwest on Mission Road to the US-101 Freeway or the I-5 Freeway
    - Route 2: Exit Site on Soto Street and travel south on Soto Street to the I-10 Freeway.

The truck routes would likely pass by the following sensitive uses, shown in **Table 3-4**.

11 NavigateLA, Haul Route layer: https://navigatela.lacity.org/navigatela/

Table 3-4
Haul Route and Sensitive Receptors

Sensitive Receptors	Distance to Site	Distance to Haul Route	
		Mission Road	Soto Street
East College Prep School	285 feet southwest	Adjacent to route	N/A
Lincoln Park	900 feet south	Adjacent to route	350 feet west
Residential uses on Mission Road	1,200 feet southwest	30 feet northwest	N/A
Keck Medicine, Hospital of USC	2,800 feet south	1,200 feet east	125 feet west
Multnomah Elementary School	915 feet southeast	N/A	410 feet east
Lincoln High School	1,100 feet west	1,100 feet west	N/A
Pueblo De LA High School	415 feet south	650 feet west	600 feet east
Applicant, October 2022.			

3.4 Requested Permits And Approvals

A haul route hearing before the Los Angeles Department of Building and Safety (LADBS) Board of Building and Safety Commissioners (BBSC) is required for all applications for import or export of more than 1,000 cubic yards of soil in the "hillside" area, as designated by the current Bureau of Engineering Basic Grid Map No. A-13372, and as referenced in ZIMAS, as a "Special Grading Area."[12]

The Site is in a Special Grading Area and the Project is importing 344,000 cy. Therefore, a haul route is required.

In order to allow for development of the Project, the Project Applicant is requesting the following discretionary approval from the City:

1. Haul route for approximately 344,000 cubic yards of imported soil.

3.5 Related Projects

CEQA Guidelines Section 15130 requires a consideration of the environmental effects of a proposed project individually, as well as cumulatively. As defined in CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts.

CEQA Guidelines Section 15130(b) states that complying with one of the following two protocols is necessary to provide an adequate discussion of significant cumulative impacts:

> *(A) A list of past, present, and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency; or*

12 https://www.ladbs.org/docs/default-source/publications/information-bulletins/building-code/GUIDELINES-FOR-SUBMITTING0-HAUL-ROUTE-APPLICATIONS-WITH-IMPORT-OR-EXPORT-AMOUNTS-GREATER-THAN-1000CUBICYARDS.pdf?sfvrsn=e4c2ff53_14

(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

As part of this analysis, the City's Los Angeles Department of Transportation (LADOT) was asked about Related Projects in the area. LADOT provided a list of 2 Related Projects within 0.5 miles of the Project Site. Internal research provided an additional 2 Related Projects. Therefore, there are 4 Related Projects. **Table 3-5** summarizes the land uses for the Related Projects.

Table 3-5
Related Projects Within 0.5 Miles of Project Site

#	Address	Distance to Site (Distance to Haul Route)	Use	Size	Status
1	2730 N. Onyx Drive	375 feet northwest (300 feet from Mission Rd. haul route)	Residential	32 units	To be constructed
2	3601 N. Mission Road	1,075 feet southwest (20 feet from Mission Rd. haul route)	Residential	185 units	To be constructed
3	1321 N. Mission Road	4,000 feet southwest (10 feet from Mission Rd. haul route)	Residential	300 units	To be constructed
4	SEC Mission Road / Zonal Avenue	4,750 feet southwest (10 feet from Mission Rd. haul route)	Residential	1,400 units	General Hospital to be converted

Sources:
Nos.1 and 2: Related Projects List, Related Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, December 7, 2022.
No. 2: https://la.urbanize.city/post/seven-story-184-unit-apartment-complex-proposed-3601-mission-road
No. 3: https://la.urbanize.city/post/county-owned-site-1321-mission-road-lincoln-heights-redevelopment
No. 4: https://la.urbanize.city/post/la-county-seeks-more-funding-general-hospital-redevelopment
https://www.latimes.com/california/story/2022-11-27/planning-the-rebirth-of-a-mothballed-l-a-landmark: Construction of the General Hospital conversion to supportive and affordable housing units would start in 2024 at the earliest, with completion in 2026.

Section 4
Environmental Impact Analysis

4.1 Aesthetics

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

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

No Impact.

A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista.

The Project Site is in a relatively flat area in the Lincoln Heights neighborhood. Other streets are densely populated with commercial, residential, and manufacturing buildings. The existing visual character of the surrounding locale is urban, and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels.

Minimal scenic or natural setting views are visible due to the urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.[1] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc. There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

The Project would involve the import of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial and office buildings (the remainder of the fill will come from on-site sources). This would be accomplished with dump trucks that would access the Site from Mission Road and Soto Street. All queuing, staging, and storage would be onsite.

No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, no impact would occur.

b) 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 would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway.

There is no historic structure on the Site. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway.

The Project is not located along or within the scenic vistas or viewsheds of a highway. The Project would not damage and/or remove any scenic resources within a State or City designated scenic highway. Therefore, no impact would occur.

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?

[1] Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].

No Impact.

A significant impact may occur if a project was to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

The Project Site is located within the Northeast Los Angeles Community Plan area, which is characterized by commercial and industrial districts and residential neighborhoods with a mix of older historic structures and newer architecture. Overall, the Project Site is located in an urbanized setting and is surrounded by commercial, residential, and manufacturing buildings, and surface parking lots.

The Project would involve the import of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial and office buildings (the remainder of the fill will come from on-site sources.

Overall, the Project would not change the visual character of the Project Site. The Project would not substantially degrade the existing visual character or quality of the Project Site or surrounding vicinity. Therefore, no impact would occur.

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

No Impact.

A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential, commercial, and manufacturing uses. Vehicle headlights from traffic around the Site contribute to overall ambient lighting levels. The operating hours of the Project are between 8:00 am and 5:00 pm, and will not increase ambient light levels in the vicinity. Therefore, no impact would occur.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient

heat reflectivity in a given area. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. The operating hours of the Project are between 8:00 am and 5:00 pm and will not increase glare in the vicinity. Therefore, no impact would occur.

Cumulative Impacts

The geographic context for the analysis of cumulative impacts related to visual character of the surrounding area and its aesthetic image would include area projects ("Area Projects") located within view of the Project Site. Area Projects located in such a position that they would not be visible from the Project Site or to which the Project would not be visible would not normally have a potential to combine with the Project to create a cumulative aesthetics impact.

Most Area Projects would not be visible from the Project Site area, due to distance and intervening structures. The nearest Area Project is No. 1, a residential development at 2730 N. Onyx Drive, 375 feet northwest of the Site. Intervening existing buildings would largely prevent views of this Area Project from the Project Site.

No scenic vistas are available from the Project Site area and as such, development of Area Projects in the vicinity of the Project Site would not result in any cumulative impacts related to scenic vistas. The degree to which each of the Area Projects contain scenic resources that could be affected by such Area Projects would be considered by the City on a case-by-case basis.

The Project Site does not contain any scenic resources that are shared by or common to any of the Area Project sites. Area Projects within the Project Site area would be required to undergo review and approval by the Department of City Planning to ensure compliance with applicable design guidelines, which would ensure continuity of these Area Projects with the City's visual character/quality standards.

The Project would not increase ambient light levels in the vicinity or contribute to any cumulative expansion of light. Operation of the Area Projects could result in an intensification of land uses in an already urbanized area of the City, which currently maintains an elevated level of ambient light and glare, typical of a densely developed city. As such, Area Projects could contribute to increased ambient light levels within the surrounding area. However, the Project Site area is already highly urbanized, so the additional illumination resulting from Area Projects would be less than significant. Further, since the operating hours of the Project are between 8:00 am and 5:00 pm, there will not be additional nighttime illumination resulting from the Project. Therefore, the Project in addition to Area Projects would not represent a significant, adverse alteration to the existing nighttime visual environment nor would there be any increase in nighttime light to substantially affect nearby sensitive uses. For these reasons, cumulative aesthetics impacts would be less than significant.

4.2 Agriculture And Forestry Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact.

A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and

Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned M1-1 and CM-1 and the General Plan land use designation for the Site is Limited Industrial and Commercial Manufacturing. The Site is developed with warehouse, logistics, and light industrial buildings and associated parking lots. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[2] Therefore, no impact would occur.

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

No Impact.

A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[3] The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact would occur.

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

No Impact.

Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. Therefore, no impact would occur.

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

No Impact.

The Project Site is not designated or zoned for forest or timberland or used for foresting. Additionally, the Project Site is located in an urbanized area of the City and is not within any forestland area. Therefore, no impact would occur.

2 State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018, Map, website: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed January 14, 2023.

3 State of California Department of Conservation, Williamson Act Program, website: https://www.conservation.ca.gov/dlrp/wa, accessed January 14, 2023.

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

No Impact.

A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. Therefore, no impact would occur.

Cumulative Impacts

Neither the Project Site nor any of the Area Projects are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

4.3 Air Quality

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

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

The analysis in this section is based primarily on the following (refer to **Appendix B**):

B Air Quality Technical Modeling, DKA Planning, May 2023

Regulatory Framework

Federal

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the CAA is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: CO (carbon monoxide), NO2 (nitrogen dioxide), O3 (ozone), PM2.5 (particulate matter, 2.5 microns), PM10 (particulate matter, 10 microns), SO2 (sulfur dioxide), and Pb (lead).

The Clean Air Act (CAA) requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in **Table 4.3-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O3, PM2.5, and Pb.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

Table 4.3-1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	N/A[1]	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Maintenance
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Maintenance
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

[1]N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, 2020 (www.arb.ca.gov/desig/adm/adm.htm).

State

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

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 4.3-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O3, PM10, and PM2.5.

In August 2022, CARB approved regulations to ban new gasoline-powered cars beginning with 2035 models. Automakers will gradually electrify their fleet of new vehicles, beginning with 35 percent of 2026 models sold. In September 2022, CARB proposes regulations that mandate that all new medium- and heavy-duty trucks would be zero emissions in 2040. Trucking companies would also have to gradually convert their existing fleets to zero emission vehicles, buying more over time until all are zero emissions by 2042.

Toxic Air Contaminant Identification and Control Act. The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act (TACICA) created California's program to reduce exposure to air toxics. Under the TACICA, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The TACICA also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing H2S at levels above the state standard could result in exposure to a disagreeable rotten eggs odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[4] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[5] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of

4 California Air Resources Board, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.

5 California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

Assembly Bill 2588 Air Toxics "Hot Spots" Program. The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional (South Coast Air Quality Management District)

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Site), Riverside, and San Bernardino counties.

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. However, SCAQMD has primary authority over about 20 percent of NO_x emissions, a precursor to ozone formation. Construction projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or

which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

- SCAQMD Rule 431.2, would require use of low-sulfur fuel in construction equipment.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Air Quality Management Plan. SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region's air quality attainment plan to address the "extreme" ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NOx emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in SCAG's 2020-2045 RTP/SCS.

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V, released in August 2021.[6] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. It finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the estimate in MATES IV (page ES-13). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by computer modeling that estimated the risk of cancer from breathing toxic air pollution based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (Figure ES-2).

Regional (Southern California Association of Governments)

6 South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

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 the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) on September 23, 2020. The RTP/SCS aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing GHG emissions by 19 percent by 2035

Local (City of Los Angeles)

City of Los Angeles General Plan Air Quality Element. The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

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

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

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

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

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

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

California Environmental Quality Act. In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

Existing Conditions

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O3), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter ten microns or less in diameter (PM10), particulate matter 2.5 microns or less in diameter (PM2.5),

and lead (Pb). The following descriptions of each criteria air pollutant and their health effects are based on information provided by the SCAQMD.[7]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2). Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The

7 South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.

elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_x, as well as PM.

Sulfates (SO_4^{2-}). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants (TACs)

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[8]

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer (μm)), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 μm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[9,10]

Project Site

The Project Site is located within the South Coast Air Basin (the Basin); named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as a non-attainment area for O_3, $PM_{2.5}$, and lead. This classification denotes that the Basin does not meet

8 California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

9 California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.

10 California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a non-attainment area for O_3, PM_{10}, and $PM_{2.5}$. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions which produce O3 and the majority of particulate matter.

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project Site. **Table 4.3-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2019 through 2021. The one-hour State standard for O_3 was exceeded 16 times during this three-year period, including fourteen times in 2020. The federal standard was exceeded 26 times in that same period. In addition, the daily State standard for PM_{10} was exceeded 203 times. The daily federal standard for $PM_{2.5}$ was exceeded 15 times. CO and NO_2 levels did not exceed the CAAQS from 2019 to 2021 for 1-hour (and 8-hour for CO).

Sensitive Receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The California Air Resources Board (CARB) has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Table 4.3-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2019	2020	2021
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.080	0.185	0.099
Days > 0.09 ppm (State 1-hour standard)	0	14	1
Days > 0.070 ppm (Federal 8-hour standard)	2	22	2
Carbon Monoxide (CO_2)			
Maximum 1-hour Concentration (ppm)	2.0	1.9	2.0
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.6	1.5	1.6
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0697	0.0618	0.0778
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration ($\mu g/m^3$)	62	77	64
Days > 50 $\mu g/m^3$ (State 24-hour standard)	3	24	3
$PM_{2.5}$			
Maximum 24-hour Concentration ($\mu g/m^3$)	43.5	47.3	61.0
Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	1	2	12
Sulfur Dioxide (SO_2)			
Maximum 24-hour Concentration (ppb)	10.0	3.8	2.2
Days > 0.04 ppm (State 24-hour standard)	0	0	0

ppm = parts by volume per million of air.
$\mu g/m^3$ = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Central LA subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed December 19, 2022.

The Project Site is located on a commercial corridor in East Los Angeles. Sensitive receptors within 0.5 miles of the Project Site and along the haul route to the nearest freeway include, but are not limited to, the following representative sampling:

- Multi-family residences, 3427-3467 Mission Road; 30 feet northwest of Mission Road haul route.
- Multi-family residences, 2226-2230 Parkside Avenue; 115 feet northwest of the Project Site.
- East College Prep Charter School (3825 Mission Road); 285 feet southwest of the Project Site

- Pueblo De Los Angeles High School (3921 Selig Place); 415 feet south of the Project Site.
- Lincoln Park (3501 Valley Boulevard), 900 feet south of the Project Site.
- Multnomah Elementary School (2101 Indiana Avenue); 915 feet southeast of the Project Site.
- Lincoln High School (3501 Broadway); 1,100 feet west of the Project Site.

Existing Project Site Emissions. The Project Site is occupied by warehouse, logistics, light industrial and office buildings with subterranean and surface parking lots. The proposed handling and storage of imported soils would be located on a portion of the Project Site currently used as surface parking. No existing emissions credit are taken to represent a worse-case proposed Project approach, as analyzed below.

Project Impacts

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod, version 2022.1.1.12) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focus on the potential change in air quality conditions due to Project implementation. Air pollutant emissions would result from hauling activities. Specific methodologies used to evaluate these emissions are discussed below.

Construction. Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Project-specific information was provided describing the schedule of construction activities and the equipment inventory required from the Applicant. Details pertaining to the schedule and equipment can be found in the Technical Appendix to this analysis. The CalEEMod model provides default values for daily equipment usage rates and worker trip lengths, as well as emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by the CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition to vehicle trips to and from the Project Site.

The SCAQMD recommends that air pollutant emissions be assessed for both regional scale and localized impacts. The regional emissions analysis includes both on-site and off-site sources of emissions, while the localized emissions analysis focuses only on sources of emissions that would be located on the Project Site.

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.[11] The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.[12] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. Please refer to **Threshold b)** below, for the analysis of localized impacts from on-site construction activities.

In accordance with SCAQMD guidance, maximum daily emissions of NO_X, CO, PM_{10}, and PM2.5 from on-site sources during each construction activity were compared to LST values for a one-acre site having sensitive receptors within 25 meters (82 feet).[13] While the area to be used for handling imported soils will be larger, the assumptions about the size of the Project Site and distance to receptors will assure a more conservative analysis that is more protective of public health.

The Basin is divided into 38 SRAs, each with its own set of maximum allowable LST values for on-site emissions sources during construction and operations based on locally monitored air quality. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values.

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD localized significance thresholds (LSTs) for NO_2, CO, and PM_{10} were initially published in June 2003 and revised in July 2008.[14] The LSTs for $PM_{2.5}$ were established

11 South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.

12 South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, October 2009.

13 South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

14 South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

in October 2006.[15] Updated LSTs were published on the SCAQMD website on October 21, 2009.[16] **Table 4.3-3** presents the significance criteria for construction emissions.

Table 4.3-3
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions	
	Regional	Localized /a/
Volatile Organic Compounds (VOC)	75	--
Nitrogen Oxides (NO_X)	100	74
Carbon Monoxide (CO)	550	680
Sulfur Oxides (SO_X)	150	--
Respirable Particulates (PM_{10})	150	5
Fine Particulates ($PM_{2.5}$)	55	3

/a/ Localized significance thresholds assumed a one-acre and 25-meter (82-foot) receptor distance in the Central LA source receptor area. The SCAQMD has not developed LST values for VOC or SO_X. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008).

Source: SCAQMD, South Coast AQMD Air Quality Significance Thresholds, 2019.

Toxic Air Contaminants Impacts (Construction). Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

Thresholds of Significance

City and SCAQMD Thresholds

For this analysis the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations recommended by the City of Los Angeles and SCAQMD Thresholds, as appropriate, to assist in answering the Appendix G Threshold questions.

(a) Construction

The City recommends that determination of significance be made on a case-by-case basis, considering the following criteria to evaluate construction-related air emissions:

15 South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

16 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009.

(i) Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

(ii) Fugitive Dust—Grading, Excavation and Hauling

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

(iii) Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

(iv) Other Mobile Source Emissions

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Thresholds. Under these thresholds, a significant threshold would occur when:[17]

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_X; (2) 75 pounds a day for VOC; (3) 150 pounds per day for PM_{10} or SO_X; (4) 55 pounds per day for $PM_{2.5}$; and (5) 550 pounds per day for CO.

17 South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [339 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 µg/m^3] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

(b) Toxic Air Contaminants

The City recommends that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate TACs:

- Would the project use, store, or process carcinogenic or non-carcinogenic toxic air contaminants which could result in airborne emissions?

In assessing impacts related to TACs in this section, the City uses Appendix G as the thresholds of significance. The criteria identified above will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under Appendix G thresholds. Under these thresholds, a significant threshold would occur when:[18]

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.[19] For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

(c) Consistency with Applicable Air Quality Plans

CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. This analysis is conducted to assess potential project impacts against Threshold (a) from the Appendix G thresholds. In accordance with the SCAQMD's *CEQA*

18 South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).

19 Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.

Air Quality Handbook, the following criteria are used to evaluate a project's consistency with the AQMP:[20]

- 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?

- 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
  - To what extent is Project development consistent with the AQMP land use policies?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP and SCAG regional plans and policies. In addition, the Project's consistency with the City of Los Angeles General Plan Air Quality Element is discussed.

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

Less Than Significant Impact.

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

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. Three criteria are generally used to evaluate consistency with the applicable air quality plan: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

In this case, the Project is the import of soil to a location in Los Angeles and does not involve development that would generate housing or add population and jobs to the Project Site. As such, the Project would not conflict with or obstruct implementation of the 2022 Air Quality Management Plan for the region.

20 South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, p. 12-3.

City of Los Angeles Policies

The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in **Table 4.3-4**, the Project is consistent with the applicable policies in the Air Quality Element. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

Table 4.3-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Source: DKA Planning, 2023.	

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

Less Than Significant Impact.

Construction

The Project would involve the import of 344,000 cubic yards (CY) of soil from remote locations to the Project Site. As each truck load will have the capacity of 14 cubic yards, approximately 24,572 truck loads would be needed to import soil to the Project Site. This would equate to an average of 200 loads a day over a 6-month period due to the current high demand of dirt export from other construction sites that could involve up to a 25-mile distance to the Project Site.

Off-road equipment (e.g., rubber tired dozers) would handle and store soils on-site, where best practices and SCAQMD Rule 403 would govern storage of these materials. See **Project Design Features (PDF) PDF-AQ-1** through **PDF-AQ-3** for a description of those practices.

A cumulatively considerable net increase would occur if the project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions

generated by a set of cumulative development projects nor provides thresholds of significance to assess the impacts associated with these emissions.[21]

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.12 model and a projected duration of about six months. During that time, the Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.

- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity creates air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers. NO_X emissions would primarily result from the use of construction equipment and truck trips.

Fugitive dust emissions would peak during grading activities, where approximately 344,000 cubic yards of soil would be imported to the Project Site. All construction projects in the Basin must comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, utilizing a wheel washing system or other control measures to remove bulk material from tires, and vehicle undercarriages before vehicles exit the Project Site. Compliance with Rule 403 would reduce regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent.

21 South Coast Air Quality Management District, 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR…Projects that exceed the project-specific significance threshold are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.

As shown in **Table 3.4-5**, the hauling project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table 3.4-5
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2024	2.8	63.0	32.3	0.3	14.5	5.7
Maximum Regional Total	2.8	63.0	32.3	0.3	14.5	5.7
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	2.1	18.7	15.6	<0.1	4.6	2.7
Localized Threshold	N/A	74	680	N/A	5	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)
Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.12 model runs. LST analyses based on one-acre site with 25-meter distances to receptors in Central LA source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[22] LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2019-2021) for the Project Site.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central Los Angeles SRA based on construction site acreage that is less than or equal to one acre. While the area to be used for handling imported soils will be larger, the assumptions about the size of the Project Site and distance to receptors will assure a more conservative analysis that is more protective of

[22] South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

public health. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences 3427-3467 Mission Road, 30 feet northwest of the haul route on Mission Road. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters (82 feet).

As shown in **Table 3.4-5**, above**,** the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are considered less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

There are several sensitive receptors within 0.5 miles of the Project Site that could be exposed to air pollution from construction activities, including, but are not limited to, the following representative sampling:

- Multi-family residences, 3427-3467 Mission Road; 30 feet northwest of Mission Road haul route.
- Multi-family residences, 2226-2230 Parkside Avenue; 115 feet northwest of the Project Site.
- East College Prep Charter School (3825 Mission Road), 285 feet southwest of the Project Site
- Pueblo De Los Angeles High School (3921 Selig Place), 415 feet south of the Project Site.
- Lincoln Park (3501 Valley Boulevard), 900 feet south of the Project Site.
- Multnomah Elementary School (2101 Indiana Avenue), 915 feet southeast of the Project Site.
- Lincoln High School (3501 Broadway), 1,100 feet west of the Project Site.
- Keck Medicine and Hospital of USC (1500 San Pablo Street), 2,800 feet south of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in **Table 3.4-3**, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic

hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively.

As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in **Table 3.4-6**, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately six months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Finally, the Project would not result in any substantial emissions of TACs during the construction phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[23] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter.

To help ensure the import and storage of soil at the Project Site minimizes all emissions and impacts to local sensitive receptors, the following **Project Design Features** (PDFs) are planned:

[23] California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. www. http://oehha.ca.gov/public_info/facts/dieselfacts.html

Project Design Features

PDF-AQ-1 Hauling of soil will incorporate the following best management practices:

- Clean or cover interior of emptied truck cargo compartments before leaving the site.
- Prevent spillage or loss of bulk materials from holes or other openings in the cargo compartment's floor, sides, and tailgates.
- Cover haul trucks with a tarp.
- Ensure haul trucks maintain freeboard is not less than six inches.
- Vacuum or wet sweep fine dirt from paved roads.
- Promptly clean up spills.
- Clean construction vehicles leaving the site by using vehicle underbody wash stations.
- Install wheel washers and/or rumble grates shall be used at the entrance/exit(s) to the construction site to minimize track-out of soils.
- When required by LADOT, provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable.
- Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible.
- Construction contractors shall provide temporary traffic controls such as a flag person to maintain smooth traffic flow.
- Maximize a buffer zone truck traffic and sensitive receptors, where feasible.

PDF-AQ-2 On-site handling and activities will incorporate the following best management practices:

- Visible dust plumes shall not exceed Ringelmann 2 opacity levels
- Stop earthmoving activities during wind events
- Stop handling of bulk materials during wind events

- Restrict idling of construction equipment and on-road heavy duty trucks to a maximum of five minutes when not in use.
- Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g., engine catalysts) to the extent they are readily available and feasible.
- Configure construction parking to minimize traffic interference.
- Implement the fugitive dust control measures as required in the South Coast Air Quality Management District's Rule 403 Fugitive Dust.

PDF-AQ-3 On-site storage of soil will incorporate the following best management practices:

- Cover piles with wind-impervious fabric with less than 50% porosity.
- Prevent water erosion onto paved roads through stormwater drainage improvements.

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

Less Than Significant Impact.

The Project would not result in activities that create objectionable odors. The Project involves import of soil and would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

While the Project would generate short- and long-term emissions during the construction phase, respectively, the presence of any other development projects could produce cumulative impacts. There are four potential Area Projects identified by the City of Los Angeles within 0.5 miles of the Project (**Table 3.4-6**).

Beyond 1,000 feet of the Project Site, any sensitive receptors between the Project Site and any Area Project would be negligibly impacted, as localized pollutants substantially disperse as a function of distance, meteorology, and terrain. The U.S. EPA finds that in the context of roadway pollutants, "…concentrations generally decrease to background levels within 500-600 feet."[24] CARB also finds that air pollution levels can be significantly higher within 500 feet of freeways or other major sources.[25]

24 U.S. EPA. Near Roadway Air Pollution and Health: Frequently Asked Questions. August 2014.

25 South Coast Air Quality Management District. Guidance Document: Air Quality Issues Regarding Land Use.

Based on the status of potential Area Projects in **Table 3.4-6**, most of these potential projects will not contribute to cumulative air quality impacts from any concurrent construction. Specifically, one project (#1) is located within 1,000 feet of the Project Site and/or haul route. The impact of cumulative development on short-term construction air quality is discussed below.

Table 3.4-6
Area Projects Within 0.5 Miles of Project Site

#	Address	Distance to Site (Distance to Haul Route)	Use	Size	Status
1	2730 N. Onyx Drive	375 feet northwest (300 feet from Mission Rd. haul route)	Residential	32 units	To be constructed
2	3601 N. Mission Road	1,075 feet southwest (20 feet from Mission Rd. haul route)	Residential	185 units	To be constructed
3	1321 N. Mission Road	4,000 feet southwest (10 feet from Mission Rd. haul route)	Residential	300 units	To be constructed
4	SEC Mission Road / Zonal Avenue	4,750 feet southwest (10 feet from Mission Rd. haul route)	Residential	1,400 units	General Hospital to be converted

Sources:
Nos.1 and 2: Area Projects List, Area Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, December 7, 2022.
No. 2: https://la.urbanize.city/post/seven-story-184-unit-apartment-complex-proposed-3601-mission-road
No. 3: https://la.urbanize.city/post/county-owned-site-1321-mission-road-lincoln-heights-redevelopment
No. 4: https://la.urbanize.city/post/la-county-seeks-more-funding-general-hospital-redevelopment
https://www.latimes.com/california/story/2022-11-27/planning-the-rebirth-of-a-mothballed-l-a-landmark: Construction of the General Hospital conversion to supportive and affordable housing units would start in 2024 at the earliest, with completion in 2026.

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2022 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2022 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population growth resulting from the Project would be consistent with the growth projections of the AQMP. Any Area Project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if required due to any significant emissions impacts. In addition, each Area Project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project's contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

Construction

SCAQMD recommends that any construction-related emissions from development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered

cumulatively considerable.[26] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As summarized in **Table 3.4-6**, the Project would not exceed the SCAQMD's mass emissions thresholds and would not contribute to any potential cumulative impact. If any Area Project was projected to exceed LST thresholds (after mitigation), it could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each Area Project would generally involve diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each Area Project would not result in a long-term substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities, which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative toxic emission impacts during construction would be less than significant.

26 White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

4.4 Biological Resources

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

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

No Impact.

The Project Site is located in an urbanized and developed area of the City. The Site contains several warehouse, logistics, and light industrial buildings and surface parking lots. The Project would not be impacting any trees. No habitat would be modified. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized and developed area of the City. The Site contains several warehouse, logistics, and light industrial buildings and surface parking lots. No riparian or other sensitive natural communities are located on or adjacent to the Project Site.[27] Thus, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural communities. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized and developed area of the City. The Site contains several warehouse, logistics, and light industrial buildings and surface parking lots. No wetlands are located on or adjacent to the Project Site.[28] Thus, implementation of the Project would not result in any adverse effect on wetlands. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized and developed area of the City. The Site contains several warehouse, logistics, and light industrial buildings and surface parking lots. The Site is not part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Site that are used by migratory fish, and there are no wildlife nursery sites in the area. The Project would not be impacting any trees. Therefore, no impact would occur.

27 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed January 20, 2023.

28 U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed January 20, 2023.

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

No Impact.

In accordance with the LAMC Section 17.02 protected trees are defined any of the following Southern California native tree or shrub species:

- Oak tree including Valley Oak *(Quercus lobata)* and 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 racemosa)*; California Bay *(Umbellularia californica);* Mexican Elderberry (*Sambucus Mexicana*); and Toyon (*Heteromeles arbutifolia*)

The Project would not be impacting any trees. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized area of the City. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Site, and the site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[29] There are no City or County significant ecological areas on or around the Project Site.[30] There are no California Natural Community Conservation Plans (CNCCP) in the area. The only CNCCP in LA County is in the City of Rancho Palos Verdes.[31] There are no Habitat Conservation Plans near the Site.[32] Therefore, no impact would occur.

Cumulative Impacts

All of the Area Projects would be located in highly urban areas and likely do not contain significant biological resources, such as special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

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29 City of Los Angeles General Plan Conservation Element, Exhibit B2.

30 Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/, accessed January 9, 2023.

31 California Natural Community Conservation Plans, April 2019, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, accessed January 9, 2023.

32 USFWS, Habitat Conservation Plans: https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP, accessed January 9, 2023.

4.5 Cultural Resources

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

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

No Impact.

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

The Project would involve the import of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial and office buildings (the remainder of the fill will come from on-site sources). There is no historic structure on the Site. According to ZIMAS, the Project Site does not require historic preservation review.[33] Therefore, no impact would occur.

33 HistoricPlacesLA: http://www.historicplacesla.org/map, accessed January 20, 2023.

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

No Impact.

A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. Sate CEQA Guidelines Section 15064.5 defines significant archaeological resources as resources that meet the criteria for historical resources or resources that constitute unique archaeological resources. A project-related significant impact could occur if a project would significantly affect archaeological resources that fall under either of these categories.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing warehouse, logistics, and light industrial buildings and surface parking lot. No excavation would occur. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing warehouse, logistics, and light industrial buildings and surface parking lot. No excavation would occur. Therefore, no impact would occur.

In accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code (PRC). The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC).

Cumulative Impacts

It is possible that some of the Area Projects could result in significant impacts on historical resources. However, as discussed above, the Project would not result in direct or indirect impacts to any significant historical resource. Thus, the Project would not have the potential to contribute

toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City that involves ground-disturbing activities is required to implement the City's Standard Condition of Approval related to Inadvertent Discovery of Archaeological Resources, and existing state and City regulations related to human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

4.6 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?	☐	☐	☐	☒

The analysis in this section is based primarily on the following (refer to **Appendix C**):

C Energy and Fuel Calculations, CAJA Environmental Services, May 2023

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

Less Than Significant.

This analysis addresses the criteria outlined in Appendix F of the CEQA Guidelines.

Criterion 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.*

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. As discussed below, construction activities, including the demolition of existing structures and 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).

As shown in **Table 4.6-1**, a total of 3,613 kWh of electricity, 929 gallons of gasoline, and 191,600 gallons of diesel is estimated to be consumed during soil import. During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction

activities necessitating electrical power. Electricity would be supplied to the Project Site by existing electrical services within the Project Site and would not affect other services.

Table 4.6-1
Summary of Energy Usage During Construction

Energy Type	Quantity
Electricity	
Fugitive Dust Control	3,613 kWh
Gasoline	
On Road (Worker)	929 gallons
Diesel	
On Road (Haul)	180,882 gallons
Off Road	10,718 gallons
Total	**191,600 gallons**
Total Mobile	**192,529 gallons**
Detailed calculations in Appendix C.	

As shown in **Table 4.6-1**, a total of approximately 3,613 kWh of electricity is anticipated to be consumed during soil import. 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. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the site and staging areas would also comply with applicable Title 24 requirements, which includes limits on the wattage allowed per specific area, which result in the conservation of energy.[34] As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the SCAQMD average fuel economy for typical worker vehicle types (automobiles, trucks) in 2023 was 24.5 miles per gallon (mpg) for gasoline and 6.8 mpg for diesel.[35] In 2018, California consumed a total of 3.4 billion barrels of gasoline for transportation, which is equivalent to a total annual consumption of 143 billion gallons by the transportation sector.[36]

The petroleum-based fuel use summary provided in **Table 4.6-1** represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an

34 California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.

35 CARB, https://arb.ca.gov/emfac/emissions-inventory.

36 EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, August 2021. One barrel of oil has 42 gallons of oil.

estimated 929 gallons of gasoline and approximately 191,600 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of the annual on-road gasoline-related energy consumption and 0.006 percent of the annual diesel fuel-related energy consumption in Los Angeles County.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation.[37] In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. Anti-idling regulations would limit the amount of fuel wasted in equipment and trucks that are not in operation. Emissions regulations to control diesel particulate matter (DPM) and NO_x emissions would require that engines be more efficient, which results in reduced fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to Federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

Further, while soil import activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of the import of soil. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[38]

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37 The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2485) was primarily adopted to reduce diesel air toxic pollutant emissions from heavy-duty trucks but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by not allowing diesel trucks to idle for greater than 5 minutes at any location. The Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles (Title 13, CCR, Division 3, Chapter 1, Section 2025) was primarily adopted to reduce pollutant emissions but also indirectly encourages the use of petroleum-based fuel in a more efficient manner by requiring retirement, replacement, or repower of older less efficient, dirtier engines.

38 California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities.

Criterion 2: *The effects of the project on local and regional energy supplies and on requirements for additional capacity.*

The Project's import of soil would not use electricity or natural gas supplies.

Criterion 3: *The effects of the project on peak and base period demands for electricity and other forms of energy.*

The Project's import of soil would not use electricity or natural gas supplies.

Criterion 4: *The degree to which the project complies with existing energy standards.*

The Project would be required to comply with Title 24 requirements, CalGreen requirements, and the City's Green Building Code.

Criterion 5: *The effects of the project on energy resources.*

The Project's import of soil would not use electricity or natural gas supplies.

Criterion 6: *The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.*

Approximately 616,121 thousand barrels of crude oil (approximately 25.9 billion gallons) were supplied to California refineries in 2019.[39] Assuming the same supply of crude oil is provided to California, the Project's estimated consumption would be a small fraction of one percent of available fuel reserves. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies, and impacts on energy resources would be less than significant.

Conclusion

[39] California Energy Commission, Oil Supply Sources to California Refineries, https://ww2.energy.ca.gov/almanac/petroleum_data/statistics/crude_oil_receipts.html, accessed April 27, 2020.

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction. Additionally, the Project would not conflict with or obstruct a state or local plan for renewable energy efficiency. Therefore, impacts related to energy would be less than significant.

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

No Impact.

Energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen building code, and the City's Green Building Code. As these conservation policies are mandatory under the City's Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. As discussed in more detail in response to Checklist Question 8(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency) and Checklist Question 11(b) (Land Use and Planning – Plan/Policy/Regulation Consistency), the Project would also be consistent with the LA Green Plan/Climate LA and SCAG's 2020-2045 RTP/SCS.

In order to meet reduction goals in the LA Green Plan/ClimateLA, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. With regard to solid waste, the City implemented the RENEW LA plan to meet solid waste reduction goals by expanding recycling to multi-family dwellings, commercial establishments, and restaurants. The Project would be indirectly affected by these actions and would further reduce water and solid waste generation, thereby meeting the goals of the LA Green Plan/ClimateLA. With respect to the Sustainable City pLAn, in more detail in response to Checklist Question 8(b) (Greenhouse Gas Emissions – Plan/Policy/Regulation Consistency), although the pLAn is not directly applicable to private development projects, the Project would generally be consistent with the City's targets related to decrease of VMT per capita by 5 percent by 2025 and to increase trips made by walking, biking, or transit by at least 35 percent by 2025.

The Project would not conflict with the LA Green Building Code, which requires a 20 percent reduction in water use and a requirement to exceed Title 24 energy efficiency standards. For these reasons, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur.

Cumulative Impacts

The Project, in conjunction with the Area Projects, could result in a net increased demand for transportation energy. As discussed previously, the NHTSA and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and Area Projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Also, all of the Area Projects are located in a transit-rich area of the City and as such, provide

opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

4.7 Geology And Soils

In 2015, the California Supreme Court in the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [Case No. S213478]) (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users.

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

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.

No Impact.

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

The Site is not located within an Alquist-Priolo Earthquake Fault Zone.[40] The Site is not located within a City of Los Angeles Preliminary Fault Study Area. Therefore, no impact would occur.

ii. Strong seismic ground shaking?

No Impact.

The principal seismic hazard to the Project Site and Project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures have designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and

40 ZIMAS search: http://zimas.lacity.org/.

construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury.

The Site is not within an earthquake fault zone or seismic hazards zone.[41] Therefore, no impact would occur.

iii. Seismic-related ground failure, including liquefaction?

No Impact.

Liquefaction is a phenomenon in which saturated silty to cohesion-less soils below the groundwater table are subject to temporary loss of strength due to buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

The Site is within a liquefaction zone.[42] The import of soil will not affect soils underneath the Site. Therefore, no impact would occur.

iv. Landslides?

No Impact.

A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The Site is not within a landslide zone.[43] The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[44] Therefore, no impacts would occur.

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

No Impact.

The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. No excavation would occur. Therefore, no impact would occur.

41 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

42 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

43 CA Department of Conservation: https://maps.conservation.ca.gov/cgs/EQZApp/app/

44 ZIMAS search: http://zimas.lacity.org/.

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?

No Impact.

The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. No excavation would occur. Therefore, no impact would occur.

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

No Impact.

The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. No excavation would occur. Therefore, no impact would occur.

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

No Impact.

The Project Site is located within a community served by existing sewage infrastructure and would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

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

No Impact.

The Project Site and surrounding area are flat and are currently developed. No unique geologic features are located on or near the Project Site.

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

The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and surface parking lot. No excavation would occur. Therefore, no impact would occur.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, Project cumulative geotechnical impacts would be less than significant.

4.8 Greenhouse Gas Emissions

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

The analysis in this section is based primarily on the following (refer to **Appendix D**):

D Greenhouse Gas Technical Modeling, DKA Planning, May 2023

Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of greenhouse gas (GHG) emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.[45]

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHG emissions, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing), deforestation, agricultural activity, and the decomposition of solid waste.

45 Intergovernmental Panel on Climate Change, 2014: Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)].

Scientists refer to the global warming context of the past century as the "enhanced greenhouse effect" to distinguish it from the natural greenhouse effect.[46]

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the United States Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 1.5 times between 1990 and 2008. In addition, in the Global Carbon Budget 2014 report, published in September 2014, atmospheric carbon dioxide (CO_2) concentrations in 2013 were found to be 43 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.[47] Global increases in CO_2 concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO_2 GHG, these have also increased significantly since 1990. In particular, studies have concluded that it is very likely that the observed increase in methane (CH_4) concentration is predominantly due to agriculture and fossil fuel use.[48]

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the "Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol," avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.[49]

With regard to the adverse effects of global warming, as reported by the Southern California Association of Governments (SCAG), "Global warming poses a serious threat to the economic well-being, public health, and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO_2 emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem."

46 Center for Climate and Energy Solutions, Climate Change 101: Understanding and Responding to Global Climate Change.

47 C. Le Quéré, et al., Global Carbon Budget 2014, (Earth System Science Data, 2015, doi:10.5194/essd–7–47–2015).

48 USEPA, Atmospheric Concentrations of Greenhouse Gas, updated June 2015.

49 United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007

GHG Emissions Background. GHG emissions include CO_2, CH_4, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[50] Carbon dioxide is the most abundant GHG. Other GHG emissions are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHG emissions are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHG emissions is provided in **Table 4.8-1**.

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties used to estimate the potential future impacts of emissions of different gases upon the climate system. The GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2. The higher the GWP, the more that a given gas warms the Earth compared to CO_2 over that period. A summary of the atmospheric lifetime and GWP of selected gases is presented in **Table 4.8-2**.[51] As indicated on the table, the GWP ranges from 1 to 22,800.

Projected Impacts of Global Warming in California. The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be eliminated. Nonetheless, the IPCC's Fifth Assessment Report, Summary for Policy Makers states that, "it is extremely likely that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forces together."[52] A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.[53]

According to the California Air Resources Board (CARB), the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation. Below is a summary of some of

50 As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

51 Atmospheric lifetime is defined as the time required to turn over the global Atmospheric burden. Source: Intergovernmental Panel on Climate Change, IPCC Third Assessment Report: Climate Change 2001 (TAR), Chapter 4: Atmospheric Chemistry and Greenhouse Gases, 2001, p. 247.

52 Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, page 5, 2013, http://ipcc.ch/report/ar5/syr/. Accessed April 2020.

53 Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010;107:12107-12109.

the potential effects that could be experienced in California because of global warming and climate change.

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.[54] However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2009, the California Natural Resources Agency (CNRA) published the *California Climate Adaptation Strategy* as a response to the Governor's Executive Order S-13-2008.[55] The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the *California Climate Adaptation Strategy*, the California Energy Commission (CEC) was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.[56] The website, known as Cal-Adapt, became operational in 2011[57] and provides a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors.

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change."[58] For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.[59] Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, reductions in spring runoff and higher

54 California Environmental Protection Agency, Preparing California for Extreme Heat: Guidance and Recommendations, October 2013, https://www.cdph.ca.gov/Programs/OHE/CDPH%20Document%20Library/CCHEP-General/CDPH-EPA-2013-Preparing-CA-for-Extreme-Heat_ADA.pdf.

55 California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

56 California Natural Resources Agency, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

57 The Cal-Adapt website address is: http://cal-adapt.org.

58 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003, page 5, http://www.pacinst.org/reports/climate_change_and_california_water_resources.pdf. Accessed April 2020.

59 Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003, http://www.pacinst.org/reports/climate_change_and_california_water_resources.pdf. Accessed April 2020.

evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.[60]

The California Department of Water Resources report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "climate change will likely have a significant effect on California's future water resources…[and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain."[61] It also reports that the relationship between climate change and its potential effect on water demand is not well understood, but "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.[62] In its *Fifth Assessment Report*, the IPCC states "Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions."[63]

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect: the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide, and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition,

60 California Natural Resources Agency, Safeguarding California: Reducing Climate Risk, an Update to the 2009 California Climate Adaptation Strategy, 2014.

61 California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, page 2-54, https://water.ca.gov/LegacyFiles/climatechange/docs/CCprogress_nov06.pdf. accessed January 21, 2023.

62 California Department of Water Resources Climate Change Report, Progress on Incorporating Climate Change into Planning and Management of California's Water Resources, July 2006, page 2-75, https://water.ca.gov/LegacyFiles/climatechange/docs/CCprogress_nov06.pdf. accessed January 21, 2023.

63 Intergovernmental Panel on Climate Change, Fifth Assessment Report, Summary for Policy Makers, 2013, page 20.

temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.[64]

Ecosystems and Wildlife. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2-11.5°F (1.1-6.4°C) by 2100, with significant regional variation.[65] Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as 2 feet along most of the United States coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.[66]

Table 4.8-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
Carbon Dioxide (CO_2)	An odorless, colorless GHG, which has both natural and anthropocentric sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO_2 are burning coal, oil, natural gas, and wood.
Methane (CH_4)	A flammable gas and is the main component of natural gas. When one molecule of CH_4 is burned in the presence of oxygen, one molecule of CO_2 and two molecules of water are released. A natural source of CH_4 is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH_4, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N_2O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, racecars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane (C_2H_6) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic

64 California Climate Change Center, Our Changing Climate: Assessing the Risks to California, 2006, https://www.ucsusa.org/resources/our-changing-climate-assessing-risks-california. accessed January 21, 2023.

65 National Research Council, Advancing the Science of Climate Change, 2010, http://dels.nas.edu/resources/static-assets/materials-based-on-reports/reports-in-brief/Science-Report-Brief-final.pdf. accessed January 21, 2023.

66 Parmesan, C., and H. Galbraith, Observed Impacts of Global Climate Change in the U.S., Prepared for the Pew Center on Global Climate Change, November 2004, https://www.c2es.org/site/assets/uploads/2004/11/observed-impacts-climate-change-united-states.pdf. accessed January 21, 2023.

Table 4.8-1
Description of Identified GHG Emissions[a]

Greenhouse Gas	General Description
	man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF_6)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF_3)	An inorganic, non-toxic, odorless, non-flammable gas. NF_3 is used in the manufacture of semi-conductors, as an oxidizer of high-energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

GHG emissions identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.
Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; Environmental Protection Agency, Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride; January 2009.

Table 4.8-2
Atmospheric Lifetimes and Global Warming Potential

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12 (+/-3)	25
Nitrous Oxide (N_2O)	114	298
HFC-23: Fluoroform (CHF_3)	270	14,800
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH_2FCF_3)	14	1,430
HFC-152a: 1,1-Difluoroethane ($C_2H_4F_2$)	1.4	124
PFC-14: Tetrafluoromethane (CF_4)	50,000	7,390
PFC-116: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800
Nitrogen Trifluoride (NF_3)	740	17,200

Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials

Regulatory Framework

Federal

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHG emissions to the atmosphere.

Federal Clean Air Act. The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid acting if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHG emissions contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171. The USEPA stated that high atmospheric levels of GHG emissions "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010.[67] While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On April 4, 2012, the USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel–fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO_2 per MW-hour (CO_2/MWh) on an average annual basis, subject to certain exceptions. Subsequently, on April 23, 2018, the USEPA issued a policy stating that CO_2 emissions from biomass-fired and other biogenic sources would be considered carbon neutral when used for energy production at stationary sources.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.[68]

Corporate Average Fuel Economy (CAFE) Standards. In response to the *Massachusetts v. Environmental Protection Agency* ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation

67 USEPA, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, Final Rule.

68 USEPA, 2012 Final Rules for Oil and Natural Gas Industry, April 17, 2012, https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/2012-final-rules-oil-and-natural-gas-industry, accessed April 2020.

(USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. In March 2020, NHTSA and USEPA adopted new less stringent standards covering model years 2021 through 2026.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.[69]

Building on the success of the first phase of standards, in August 2016, the USEPA and the NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards were to lower CO_2 emissions by approximately 1.1 billion metric tons and save vehicle owners fuel costs of about $170 billion.[70] On August 10, 2021, NHTA proposed new CAFE standards for 2024-2026 that would increase the stringency of standards by 8 percent per year rather than the previous 1.5 percent.

On September 19, 2019, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and USEPA issued a final action entitled the "One National Program Rules" to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas (GHG) emission standards for automobile and light duty trucks. This action finalizes the Safe Affordable Fuel Efficient (SAFE) Vehicles Rule and clarifies that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. The SAFE Vehicle Rule also withdraws the CAA waiver granted to the State of

69 The emission reductions attributable to the regulations for medium- and heavy-duty trucks were not included in the Project's emissions inventory due to the difficulty in quantifying the reductions. Excluding these reductions results in a more conservative (i.e., higher) estimate of emissions for the Project.

70 USEPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.

California that allowed the state to enforce its own Low Emission Vehicle program.[71] On March 31, 2020, Part II of the SAFE Vehicles was issued and sets carbon dioxide emissions and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026.[72] On December 21, 2021, NHTA repealed the SAFE I Rule.

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

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;

- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;

- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and

- While superseded by the USEPA and the NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[73]

Regulatory Framework: State

Executive Order S-3-05. This Executive Order, issued by Governor Schwarzenegger in June 2005, established GHG emissions targets for the state, as well as a process to ensure the targets are met. The order directed the Secretary for the California Environmental Protection Agency (CalEPA) to report every two years on the state's progress toward meeting the Governor's GHG emission reduction targets. The statewide GHG emissions reduction targets are as follows:

71 U.S. Department of Transportation and EPA. 2019. *One National Program Rule on Federal Preemption of State Fuel Economy Standards*, https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-one-national-program-federal-preemption-state#:~:text=In%20this%20action%20NHTSA%20is,and%20local%20programs%20are%20preempted.

72 U.S. Department of Transportation. 2020. *The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks*, https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/final_safe_preamble_web_version_200330.pdf.

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

- By 2010, reduce to 2000 emission levels;[74]
- By 2020, reduce to 1990 emission levels;
- By 2030, reduce to 40 percent below 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

The State Legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32) and Senate Bill 32, respectively, both of which are discussed below. However, the Legislature has not yet adopted a target for the 2050 horizon year.

As a result of Executive Order S-3-05, the California CAT, led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from several state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[75] The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. “Intelligent transportation systems” is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.[76]

Executive Order B-30-15. Issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.[77]

Executive Order B-55-18. Issued by Governor Jerry Brown in September 2018, this establishes a statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

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74 The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A.,” Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?,” July 3, 2013.

75 CalEPA, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

76 CalEPA, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 58.

77 California Air Resources Board, Frequently Asked Questions about Executive Order B-30-15, 2030 Carbon Target and Adaptation FAQs, April 29, 2015.

Executive Order S-1-07 (California Low Carbon Fuel Standard). Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS were directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan. The LCFS program was re-adopted in 2015 and will continue to complement other AB 32 measures, transform, and diversify the fuel pool, and is a key part of the State's petroleum reduction goals for 2030.

California Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32. The California Global Warming Solutions Act of 2006 (also known as AB 32) commits the state to achieving the following:

- By 2010, reduce to 2000 GHG emission levels;[78] and
- By 2020, reduce to 1990 levels.

To achieve these goals, which are consistent with the California CAT GHG emissions reduction targets for 2010 and 2020, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.[79]

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (the Global Warming Solutions Act) to include an emissions reductions goal for 2030. Specifically, SB 32 requires the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

Assembly Bill 197. Assembly Bill (AB) 197, signed September 8, 2016, is a bill linked to SB 32 that prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its Internet Web site the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the state's programs, policies, and investments related to climate change.

78 The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A., "Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?", July 3, 2013.

79 CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are: (1) a low- carbon fuel standard, which reduces carbon intensity in fuels statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.

Senate Bill 350. Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[80]

Senate Bill 1368. Senate Bill (SB) 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO_2 per MWh (see CEC Order No. 07-523-7).

Assembly Bill 1493 (Pavley I). Assembly Bill (AB) 1493, passed in 2002, requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG emissions from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these "Pavley" regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016.[81] Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year.[82] California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 45-percent GHG reduction in comparison to the 2009 model year.

Senate Bill 97. SB 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires the Office of Planning and Rules (OPR) to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects

80 Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.

81 California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/cc/ccms/ccms.htm, accessed April 2020.

82 California Air Resources Board, "Comparison of Greenhouse Gas Reductions for all Fifty United States under CAFE Standards and ARB Regulations Adopted Pursuant to AB 1493", January 23, 2008.

associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted on December 30, 2009 and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments.[83] The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance- based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[84]

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."[85]

In December 2018, the Governor's Office of Planning and Research (OPR) released a CEQA and Climate Change Advisory (Discussion Draft) updates the 2009 guidance for project-level analyses. It reaffirms the discretion that lead agencies have in establishing an appropriate methodology and determining significance.

Senate Bill 743. This 2013 legislation updates the way transportation impacts are measured in California, focusing on vehicle miles traveled (VMT) rather than level of service as the main measure of transportation impacts. It calls on decisionmakers throughout the State to focus on reducing overall VMT and the GHG emissions from such vehicle activity. Traffic studies in the City of Los Angeles began formally analyzing projects in this fashion effective July 1, 2020.

83 See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHG emissions).

84 14 Cal. Code Regs. § 15064.4(b).

85 Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

Senate Bill 375. Acknowledging the relationship between land use planning and transportation sector GHG emissions, Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduce passenger VMT and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

Assembly Bill 1279. This 2022 legislation creates a legally binding goal that California achieve carbon neutrality by 2045. It would also require the State to reduce GHG emissions by 85 percent below 1990 levels by 2045.

Climate Change Scoping Plan. In 2008, CARB approved the original *Climate Change Scoping Plan* as required by AB 32.[86] Subsequently, CARB approved updates to the *Climate Change Scoping Plan* in 2014 *(First Update)* and 2017 *(2017 Update)*, with the *2017 Update* considering SB 32 (adopted in 2016) in addition to AB 32.

The original *Climate Change Scoping Plan* proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.[87] The original *Climate Change Scoping Plan* identified a range of GHG reduction actions that included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. It identified several specific issues relevant to the Project, including the following:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

  > *A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.*

86 Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.

87 California Air Resources Board, Climate Change Scoping Plan, December 2008.

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020.[88] Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The original *Climate Change Scoping Plan* noted that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California must make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the original *Climate Change Scoping Plan*. For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the original *Climate Change Scoping Plan*, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations).[89]

After adoption of the original *Climate Change Scoping Plan*, a lawsuit was filed challenging CARB's approval of the *Climate Change Scoping Plan Functional Equivalent Document* (*FED to the Climate Change Scoping Plan*). On May 20, 2011 (Case No. CPF-09-509562), the Court found that the environmental analysis of the alternatives in the *FED to the Climate Change Scoping Plan* was not sufficient under the California Environmental Quality Act (CEQA). CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the *Supplemental FED to the Climate Change Scoping Plan* was approved on August 24, 2011 (*Supplemental FED*). The *Supplemental FED* indicated that there is the potential for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the *Climate Change Scoping Plan*.

As part of the *Supplemental FED*, CARB updated the projected 2020 BAU emissions inventory based on then current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006 through 2008. Specific emission reduction

88 California Department of Water Resources, 20x2020 Water Conservation Plan. The Plan called for California to reduce per capita water use from 192 to 154 gallons per capita daily from 2009 to 2020 and beyond. https://www.waterboards.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf

89 California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, p. 12, December 2008.

measures included were the million-solar-roofs program,[90] the AB 1493 (Pavley I) motor vehicle GHG emission standards, and the LCFS.[91] In addition, CARB also factored into the 2020 BAU inventory emissions reductions associated with a 33-percent RPS for electricity generation. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from BAU conditions. When the 2020 emissions level projection also was updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.[9293]

In 2014, CARB adopted the *First Update to the Climate Change Scoping Plan: Building on the Framework* (First Update).[94] The stated purpose of the First Update was to "highlight… California's success to date in reducing its GHG emissions and lay…the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.[95] The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[96]

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero net energy buildings as an element of meeting mid-term and long-term GHG emissions reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

In December 2017, CARB adopted California's 2017 *Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. The *2017 Climate Change Scoping Plan* addresses the deeper cuts required by SB 32 by a 2030 horizon year and has a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the

90 Effective January 2020, AB 178 requires all single-family residences and multi-family residences up to three stories to include solar panels to offset annual electricity consumption.

91 Pavley I is the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tonnes CO_2e reduction in 2020. Pavley II covers model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO_2e.

92 California Air Resources Board, Supplement to the AB 32 Scoping Plan FED, Table 1.2-2.

93 The emissions and reductions estimates found in the Supplemental FED to the Climate Change Scoping Plan fully replace the estimates published in the 2008 Climate Change Scoping Plan. See CARB, Resolution 11-27 (Aug. 24, 2011) (setting aside approval of 2008 Climate Change Scoping Plan and associated emissions forecasts and approving the Supplemental FED). The estimates in the 2008 document are 596 million metric tons CO_2e under 2020 BAU and a required reduction of 169 million metric tons CO_2e (28.4 percent).

94 Health & Safety Code §38561(h) requires CARB to update the Scoping Plan every five years.

95 California Air Resources Board, First Update, May 2014, p. 4.

96 California Air Resources Board, First Update, May 2014, p. 34.

program. The 2017 Scoping Plan Update includes policies to require direct GHG emissions reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial). This category of regulations can be grouped in terms of the GHG sector that benefit from their implementation. Regarding the energy sector, implementation of the California RPS program (SB 100), SB 350, and the Energy Independence and Security Act of 2007 (EISA) would reduce GHG emissions generated by energy consumption. Regarding the mobile sector, implementation of the Advanced Clean Cars Program, Advance Clean Truck Regulation, Low Carbon Fuel Standard (Executive Order S-01-07) and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the SB 1368/AB 398, CCR Title 20, and the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. Regarding the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Lastly, regarding the water sector, implementation of SB X7-7 would reduce GHG emissions associated with the energy used by the infrastructure required for the conveyance of water.

CARB adopted its *2022 Scoping Plan* update on December 15, 2022 that lays the groundwork to achieving carbon neutrality statewide by 2045. The 2022 Scoping Plan is designed to also reduce GHG emissions 85 percent below 1990 levels by 2045. Most reductions would come from conversion from combustion-based industries and technologies to electricity. While Statewide programs calling for electrifying the vehicle fleet and energy sources would account for the vast majority of GHG reductions needed by 2030, local actions are needed to supplement these.

Cap-and-Trade Program. The original *Climate Change Scoping Plan* identified a cap-and-trade program as one of the strategies for California to reduce GHG emissions. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap can trade permits to emit GHG emissions within the overall limit.

The Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities"). "Covered entities" subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered

entity with a compliance obligation is required to surrender an allowance for each metric ton CO_2e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2030 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2030 GHG emissions reduction mandate.

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. […]*[97]

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and- Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[98] Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to

97 California Air Resources Board, First Update, May 2014, p. 88.

98 While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, fuel suppliers did not have a compliance obligation (i.e., they were not fully regulated) until 2015.

electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

Assembly Bill 398 was enacted in 2017 to extend the Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

California Renewables Portfolio Standard. The California RPS program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with the Los Angeles Department of Water and Power's (LADWP) commitment to achieve 35 percent renewables by 2020.

LADWP indicates that 31 percent of its electricity came from renewable resources in 2018. Therefore, under SB 2X, LADWP is required to increase its electricity from renewable resources by an additional two percent to comply with the RPS of 33 percent.[99]

Advanced Clean Cars Regulations. In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2015–2025.[100] The components of the Advance Clean Car program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[101] In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.[102]

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The state would not restrict used car sales, nor forbid residents from owning gas-powered vehicles. In accordance with the Executive Order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive

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99 *LADWP,* 2018 Power Content Label update,https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel;jsessionid=dJLKfT5pp6lLZJlZtvTTlVVltXW1VPLLqnnKXLLSpkTGLbn6nh6n!56480797?_afrLoop=49111251050871&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D49111251050871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Ddmbiw8w82_4.

100 California Air Resources Board, California's Advanced Clean Cars Program, www.arb.ca.gov/msprog/acc/acc.htm, accessed April 2020.

101 Ibid.

102 California Air Resources Board, News Release: ZEV Regulation Fact Sheet https://ww2.arb.ca.gov/sites/default/files/2019-06/zev_regulation_factsheet_082418_0.pdf, accessed October 2020.

analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

In November 2022, the ACC II regulations took effect, setting annual ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly more stringent exhaust and evaporative emission standards (LEV program) to ensure automakers phase out new sales of internal combustion engine vehicles.

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608). The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost- effective measures, to promote the use of energy- and water-efficient appliances.

California Building Energy Efficiency Standards (Title 24, Part 6). California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[103] The 2022 standards continue to improve upon previous standards for new construction of, and additions and alterations to, residential and non-residential buildings and became effective January 1, 2023. Compliance with Title 24 is enforced through the building permit process. Key changes included encouraging heat pump technology for space and water heating, setting electric-ready requirements for single-family homes, expanding solar photovoltaic system and battery storage standards, and strengthening ventilation standards to improve indoor air quality.

California Green Building Standards (CALGreen Code). The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are mandatory green building standards for new structures. They focus on measures to reduce water consumption, GHG emissions, and materials and waste. These codes are updated every three years, with the 2022 CalGreen code updates effective January 1, 2023. New requirements address requirements for Level 2 electric vehicle chargers and use of solar photovoltaic shade structures instead of shade trees. Voluntary measures focus on higher EV charging requirements for parking facilities.

Regional

South Coast Air Quality Management District. The South Coast Air Quality Management District (SCAQMD) adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in

[103] California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed April 2020.

drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

Southern California Association of Governments. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS on September 3, 2020, calling for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated RTP/SCS calls for several land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve climate change objectives:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent

- Reducing GHG emissions by 19 percent by 2035

The 2020-2045 RTP/SCS calls for a 19 percent reduction in per capita GHG emissions by 2035 from 2005 levels. This is intended to be consistent with CARB's performance targets during this same period. The bulk of these reductions are to come from transportation investments, pricing strategies, TDM strategies, and land use programs. On October 30, 2020, CARB accepted the RTP/SCS quantification of GHG emissions on October 30, 2020 (Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination).

Local

City of Los Angeles Green Building Code. On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2010 CALGreen Code. On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. The 2020 Los Angeles Green Building Code incorporates by reference the mandatory requirements of the 2019 California Green Building Standards Code.

City of Los Angeles Green New Deal. The April 2019 Green New Deal is designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives. It was the first four-year update to the City's first Sustainable City pLAn that was released in 2015. It augments, expands, and elaborates the City's vision for a sustainable future and tackles the climate emergency with accelerated targets and new aggressive goals.

While not solely focused on climate change, reduction of GHG emissions is one of eight benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.

- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sf in 2015).

- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.

- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.

- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.

- Increase the percentage of all trips made by walking, biking, micro-mobility/ matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.

- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.

- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.

- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.

- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).

- Eliminate organic waste going to landfill by 2028.

- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.

- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

Traffic Study Policies and Procedures. The City of Los Angeles Department of Transportation (LADOT) has developed the Transportation Assessment Guidelines (TAG) (July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation impact study. The TAG is consistent with the City's goals to emphasize the importance of sustainability, smart growth, and reduction of GHG emissions in addition to traditional traffic flow considerations when evaluating and mitigating impacts to the transportation system because of land use policy decisions. The TAG prioritizes transportation demand management strategies and multi-modal strategies over automobile-centric solutions when mitigating project-related impacts to the City's transportation system. Through acknowledgement of an imminent update that will identify VMT reduction thresholds, the TAG stands as an implementing mechanism of the City's strategy to conform to the mandates and requirements of AB 32, SB 375, and SB 743.

Existing Conditions

Existing Statewide GHG Emissions. GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Events and activities,

such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal), have contributed to the rapid increase in atmospheric levels of GHG emissions over the last 150 years.

As reported by the CEC, California contributes approximately one percent of global and 8.2 percent of national GHG emissions.[104] California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO_2 produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from years 2000 through 2019.[105] It includes estimates for CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. The GHG inventory for California for years 2010 through 2019 is presented in **Table 4.8-3**. As shown therein, the GHG inventory for California in 2019 was 418.2 million $MTCO_2e$.

Table 4.8-3
California GHG Inventory
(metric tons of carbon dioxide equivalent [$MTCO_2e$])

	2013	2014	2015	2016	2017	2018	2019
Transportation	161.2	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Industrial	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Commercial & Residential	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Agriculture	161.2	162.6	166.2	169.8	171.2	169.6	166.1
High GWP	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Recycling & Waste	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Total	447.5	443.0	440.7	429.1	424.6	425.1	418.2

Source: California Air Resources Board (2021). California Greenhouse Gas Emission Inventory - 2021 Edition. Data available at: https://ww3.arb.ca.gov/cc/inventory/data/data.htm

Existing Project Site Emissions. The Project Site is occupied by light industrial and office buildings and surface parking lots. The proposed handling and storage of imported soils would be located on a portion of the Project Site currently used as surface parking. As these lots serve the adjacent buildings, there are no anthropogenic emissions of greenhouse gases from the Project Site.

Methodology

CEQA Guidelines Section 15064.4(a) assists lead agencies in determining the significance of the impacts of GHG emissions, giving them discretion to determine whether to assess impacts quantitatively or qualitatively. It calls for a good-faith effort to describe and calculate emissions. This emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation

104 California Energy Commission, Tracking Progress, Greenhouse Gas Emission Reductions. https://www.energy.ca.gov/data-reports/tracking-progress. Accessed January 2023.

105 A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.

efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from that project.

The City, SCAQMD, Office of Planning and Research (OPR), CARB, California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a 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.[106] This evaluation is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment.

The analysis also calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions because of compliance with regulations requirements adopted to implement plans for reducing or mitigating GHG emissions. However, the significance of the Project's GHG emissions is not based on the amount of emissions from the Project.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's conflict with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of CARB's *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS. In addition, this analysis assesses the Project's consistency with other plans (e.g., the Green New Deal) for informational purposes.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform project analyses. Statewide, the Climate Change Scoping Plan provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reduction required by SB 375. The City does not have a programmatic mitigation plan from which to tier from, though it has adopted plans to help reduce GHG emissions.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this chapter estimates reductions of project-related GHG emissions resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future.

106 CEQA Guidelines, Section 14 CCR 15064.4.

A consistency analysis is provided below that describes the Project's consistency with performance-based standards in the applicable parts of CARB's *Climate Change Scoping Plan,* SCAG's 2020-2045 RTP/SCS, and the Green New Deal.

Quantification of Emissions

This analysis quantifies the Project's GHG emissions for information purposes, considering the GHG reduction features that would be incorporated into the Project's design. It relies on the California Emissions Estimator Model (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) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[107]

Emissions Estimates

The Project's emissions were calculated using CalEEMod Version 2022.1.1.12. Details of the modeling assumptions and emission factors are provided in the Technical Appendix. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul and worker trips. GHG emissions were forecasted based on the proposed schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions, included in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the Green New Deal.

As part of the *Climate Change Scoping Plan*, a statewide emissions inventory was developed as required by AB 32 which directs CARB to develop and track GHG emissions reductions to document progress towards the state GHG target. The emissions inventory also considers GHG emissions reduction measures developed by CARB to achieve state targets. Consistency with the *Climate Change Scoping Plan* is evaluated by comparing the Project's GHG reduction measures to those contained in the Scoping Plan.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this chapter estimates reductions of GHG emissions

[107] California Air Pollution Control Officers Association, California Emissions Estimator Model, CalEEMod™, www.caleemod.com, accessed May 25, 2016.

resulting from consistency with plans. Consistent with evolving scientific knowledge, approaches to GHG quantification may continue to evolve in the future.

Thresholds of Significance

State CEQA Guidelines Appendix G

In accordance with Appendix G of the State CEQA Guidelines (Appendix G), a project would have a significant impact related to GHG emissions if the project would do the following:

a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment;

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions.

Project Impacts

Consistency with Applicable Plans and Policies

The discussion below describes the extent the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS, each of which focus on long-term operational impacts of development and growth. As such, most of the policies and GHG-reducing measures in these plans do not apply to the Project. This analysis also evaluates the Project's consistency with City plans and programs that generally address climate change. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

Statewide: Climate Change Scoping Plan

The movement of soil to the Project Site would not conflict with the GHG reduction-related actions and strategies of the 2022 Scoping Plan. That plan focuses on increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. As such, the six-month process of importing soil to the Project Site does not conflict with the State's 2022 Climate Change Scoping Plan and, thus, impacts related to consistency with the Scoping Plan would be less than significant.

Regional: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The movement of soil to the Project Site would not conflict with the GHG reduction-related actions and strategies of the 2020-2045 RTP/SCS. That plan focuses on growth-related strategies to curb GHG emissions over time from area, energy, mobile, water, waste, and other sources. However, it did not identify policies designed to reduce GHG from temporary projects like the Project. Similarly, the Program Environmental Impact Report for the RTP/SCS identified potential mitigation measures for development, but did not address short-term projects. As such, the six-

month process of importing soil to the Project Site does not conflict with the 2020-2045 RTP/SCS and, thus, impacts related to consistency with the RTP/SCS would be less than significant.

Locally, the City has several conservation-based plans, programs, and requirements that also indirectly call for GHG reductions. While these are not considered climate action plans, the Project's consistency with these local initiatives is summarized.

Local: City of Los Angeles General Plan Air Quality Element

The Project would be consistent with the City's General Plan, specifically its 1989 Air Quality Element. While this Element did not explicitly address control of greenhouse gases, global climate change, or resiliency objectives, it did identify several goals focused on criteria pollutant emissions that would be effective in reducing carbon-based emissions that contribute to climate change. However, it did not identify policies designed to reduce GHG from temporary projects like the Project. As such, the six-month process of importing soil to the Project Site does not conflict with the City's Air Quality Element and, thus, impacts related to consistency with the Element would be less than significant.

Local: City of Los Angeles Green New Deal (Sustainability pLAn)

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through 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.[108]

The Green New Deal was a 2019 mayoral initiative that updated the Sustainable City pLAn, including both short-term and long-term aspirations through 2035 for water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[109]

However, it did not identify policies designed to reduce GHG from temporary projects like the Project. As such, the six-month process of importing soil to the Project Site does not conflict with the City's Green New Deal and, thus, impacts related to consistency would be less than significant.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project would not conflict with the applicable plans, policies, regulations and GHG emissions reduction actions/strategies outlined in the *Climate Change Scoping Plan and Update*, the 2020-2045 RTP/SCS, the City's General Plan Air Quality Element, and the Green New Deal. 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

108 City of Los Angeles, Sustainable City pLAn, 2019.

109 City of Los Angeles, Green New Deal, 2019.

significant impact on the environment. Therefore, Project-specific impacts regarding climate change would be less than significant.

Project Emissions

In support of the consistency analysis above that describes the Project's compliance with, or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, the City's General Plan Air Quality Element, and the Green New Deal, quantitative calculations are provided below.

Emissions Analysis

The six-month soil import Project is estimated to generate a total of 2,253 $MTCO_2e$ (**Table 3.8-4**). As recommended by the SCAQMD, the total GHG emissions were amortized over the 30-year lifetime of the Project (i.e., total GHG emissions were divided by 30 to determine an annual emissions estimate.[110] This results in annual Project emissions of 75.1 $MTCO_2e$.

Table 3.8-4
Emissions Estimate ($MTCO_2e$)

Year	$MTCO_2e$[a]
2024	2,253
Total	**2,253**
Amortized Over 30 Years	**75.1**

a CO_2e was calculated using CalEEMod version 2022.1.1.12. Detailed results are provided in the Technical Appendix.
Source: DKA Planning, 2023.

Post-2020 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[111] Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. After the findings of these studies, SB 32 was passed on

110 SCAQMD Governing Board Agenda Item 31, December 5, 2008.

111 Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is a short-term movement of soil to the Project Site that would not impact the short- or long-term goal of decarbonizing industries and vehicles.

Conclusion

Given the Project's consistency with state, SCAG, and City GHG emissions reduction goals and objectives, the Project is consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable.

Cumulative Impacts

As explained above, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis, because climate change is a global problem, and the emissions from any single project alone would be negligible. Accordingly, the analysis above considered the potential for the Project to contribute to the cumulative impact of global climate change.

The analysis shows that the short-term Project does not with CARB's *Climate Change Scoping Plan*, 2020-2045 RTP/SCS, and local City plans. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

4.9 Hazards And Hazardous Materials

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

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

No Impact.

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

The Project would involve the import of soil using haul trucks. Thus, the Project does not involve the routine transport, use, or disposal of hazardous materials. Therefore, no impact would occur.

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

No Impact.

A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

The Project would involve the import of soil using haul trucks. Thus, the Project does not utilize hazardous materials. Therefore, no impact would occur.

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

No Impact.

A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds.

The Project Site is nearby the following schools:

- East College Prep Charter School (3825 Mission Road), 285 feet southwest of the Site
- Pueblo De Los Angeles High School (3921 Selig Place), 415 feet south of the Site
- Lincoln High School (3501 Broadway), 1,100 feet west of the Site
- Multnomah Elementary School (2101 Indiana Avenue), 915 feet southeast of the Site

The Project would involve the import of soil using haul trucks. Thus, the Project does not utilize hazardous materials. Therefore, no impact would occur.

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

No Impact.

In 2015, the California Supreme Court in CBIA v. BAAQMD, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project.

For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and SWRCB, 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.

The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[112]

The California Geologic Energy Management Division (CalGEM) online mapping of wells shows there is no oil and gas well on the Site.[113]

The Project Site is not within a Methane Buffer Zone.[114]

The Project would not create a significant hazard to the public or the environment, as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on this, development of the Project would not cause or exacerbate a significant hazard to the public or the environment. Therefore, no impact would occur.

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

No Impact.

The Project Site is not located within two miles of a public airport. The nearest airport is San Gabriel Valley Airport, 9 miles east of the Site. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard or excessive noise for people residing or working in the area of the Project Site. Therefore, no impact would occur.

112 Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/map/, accessed January 20, 2023.

113 California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#/, accessed January 20, 2023.

114 ZIMAS search: http://zimas.lacity.org/.

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

No Impact.

The City's General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, that identifies emergency evacuation routes, along with the location of selected emergency facilities.

Import and staging activities would be confined to the Project Site and would not affect emergency access. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Therefore, no impact would occur.

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

No Impact.

The Project Site is located in an urbanized area of the City and is completely developed. The Project Site is not subject to potential wildland fires. The Project Site is not within a Very High Fire Hazard Severity Zone.[115]Thus, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, no impact would occur.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the Project Site boundaries. All Area Projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those Area Projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, cumulative impacts related to hazards and hazardous materials would be less than significant.

115 ZIMAS search: http://zimas.lacity.org/.

4.10 Hydrology And Water Quality

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

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

Less Than Significant Impact.

A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and

minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[116]

The Project is subject to the requirements of the SUSMP, which are enforced through the City's plan approval and permit process.

Demolition, grading, soil handling, and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion.

The Project's import and storage of soil would comply with best practices such as watering and ensuring the soil does not leave the Site either by wind or rain runoff. Therefore, impacts would be less than significant.

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

No Impact.

A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is the Los Angeles River, approximately 1-mile north from the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site.

116 Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[117]

The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape and largely impervious. The Project would involve the import of soil using haul trucks. The Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, no impact would occur.

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;

No Impact.

There are no natural watercourses on the Project Site or in the vicinity of the Site. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with hardscape and largely impervious. Current stormwater runoff flows to the local storm drain system. The import of soil would not change the existing drainage patterns of the Site. Therefore, no impact would occur.

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

No Impact.

The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during import. The import of soil would not change the existing drainage patterns of the Site. Therefore, no impact would occur.

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

No Impact.

A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the

[117] LADWP, Water, Sources of Water: https://www.ladwp.com/, accessed March 24, 2020.

probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site.

Water runoff flows toward the existing storm drain system along Mission Road.[118]

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 10(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for the imported soil that will be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these "good-housekeeping" practices would reduce dust and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the LID Best Management Practices, which are determined on a case-by-case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project design plans. Therefore, no impact would occur.

iv. Impede or redirect flood flows?

No Impact.

The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[119] Also, the Project Site is not located near any bodies of water. Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impact would occur.

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

No Impact.

Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and

118 Navigate LA, Storm Drains Layer: http://navigatela.lacity.org/navigatela/.

119 FEMA, https://msc.fema.gov/portal/search?AddressQuery=350%20Hill%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor, effective on 9-26-2008; and City of Los Angeles General Plan Safety Element, Exhibit F.

providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[120],[121]

The Project is not located within an area potentially impacted by a tsunami.[122]

There are no major water-retaining structures located immediately upgradient from the Project Site. The Project is located approximately 1,400 feet southwest of the Ascot Reservoir within Ascot Hills Park. The Site is not within a flood area.[123]Therefore, flooding from a seismically-induced seiche is considered unlikely.

The Project Site is not located within an area designated as a 100-year flood hazard area.[124] In addition to the low risk of flooding, the Project includes LID requirements for capture and use and/or biofiltration system and a stormwater conveyance system, which would be improve upon the existing site, which is devoid of treatment and on-site detention. Therefore, the Project would not risk release of pollutants due to inundation by flood hazards.

Therefore, no tsunami or seiches would be expected to impact the Project Site that would risk release of pollutants due to Project inundation. No impact would occur.

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

No Impact.

Refer to responses to Checklist Questions 10(a) (Hydrology and Water Quality – Water Quality) and 10(b) (Hydrology and Water Quality – Groundwater). As discussed there, the Project would not result in any significant impacts related to water quality or groundwater.

Cumulative Impacts

The Project and the Area Projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure

120 Los Angeles General Plan, 2021 Safety Element, page 42: https://planning.lacity.org/odocument/bf51ae04-1c7b-4931-9a29-d46209998b89/2021_SafetyElementBookFINAL.pdf, accessed January 20, 2023.

121 Los Angeles, 2018 Local Hazard Mitigation Plan: https://emergency.lacity.org/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf

122 ZIMAS search: http://zimas.lacity.org/.

123 Los Angeles, 2018 Local Hazard Mitigation Plan: https://emergency.lacity.org/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf

124 NavigateLA, FEMA Flood Hazard layer: http://navigatela.lacity.org/navigatela/, January 20, 2023.

that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

4.11 Land Use And Planning

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

a) Physically divide an established community?

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 that 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 is the import of soil on an existing urban infill site and is contiguous and bounded by streets. The Project is not affecting any rights-of-way. The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project is not of a scale or nature that would physically divide an established community (and the Project Site is not large enough to encompass an established community). Therefore, no impact would occur.

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

No Impact.

The Project would involve the import of soil. The requested haul route would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impact would occur.

Cumulative Impacts

The Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the Area Projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the Area Projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

4.12 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) 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 the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits, which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[125] MRZ-2 sites are identified in two community plan elements of the City's General Plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[126]

Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas.[127] The California Geologic Energy Management Division (CalGEM) online

125 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed January 20, 2023.

126 City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf, accessed January 20, 2023.

127 City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed January 20, 2023.

mapping of wells shows there is no oil and gas well on the Site.[128] Therefore, no impact would occur.

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

No Impact.

A significant impact would occur if a project were located in an area used or available for extraction of a locally-important mineral resource 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 in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 12(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impact would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the Area Projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

[128] California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), Online Mapping System, District 1, https://maps.conservation.ca.gov/doggr/wellfinder/#close/, accessed January 23, 2023.

4.13 Noise

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

The information in this section is based primarily on the following (refer to **Appendix E**):

E Noise Technical Modeling, DKA Planning, May 2023

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

Less Than Significant Impact.

Fundamentals of Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. **Table 4.13-1** provides examples of A-weighted noise levels from common sources.

Noise Definitions. This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}) and the Community Noise Equivalent Level (CNEL).

Equivalent Noise Level (L_{eq}): L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

Table 4.13-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993. These noise levels are approximations intended for general reference and informational use.	

Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[129] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[130]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping

[129] National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

[130] World Health Organization, Guidelines for Community Noise, 1999.

environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.[131] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level increases of 10 dBA or greater are perceived as a doubling in loudness.[132] However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.[133]

Noise Attenuation. Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.[134] The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Federal

No federal noise standards regulate environmental noise associated with short-term construction activities. As such, temporary noise impacts produced by the Project are largely regulated or evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

131 Ibid.

132 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

133 World Health Organization, Guidelines for Community Noise, 1999.

134 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

State

The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. **Table 4.13-2** illustrates State compatibility considerations between land uses and exterior noise levels.

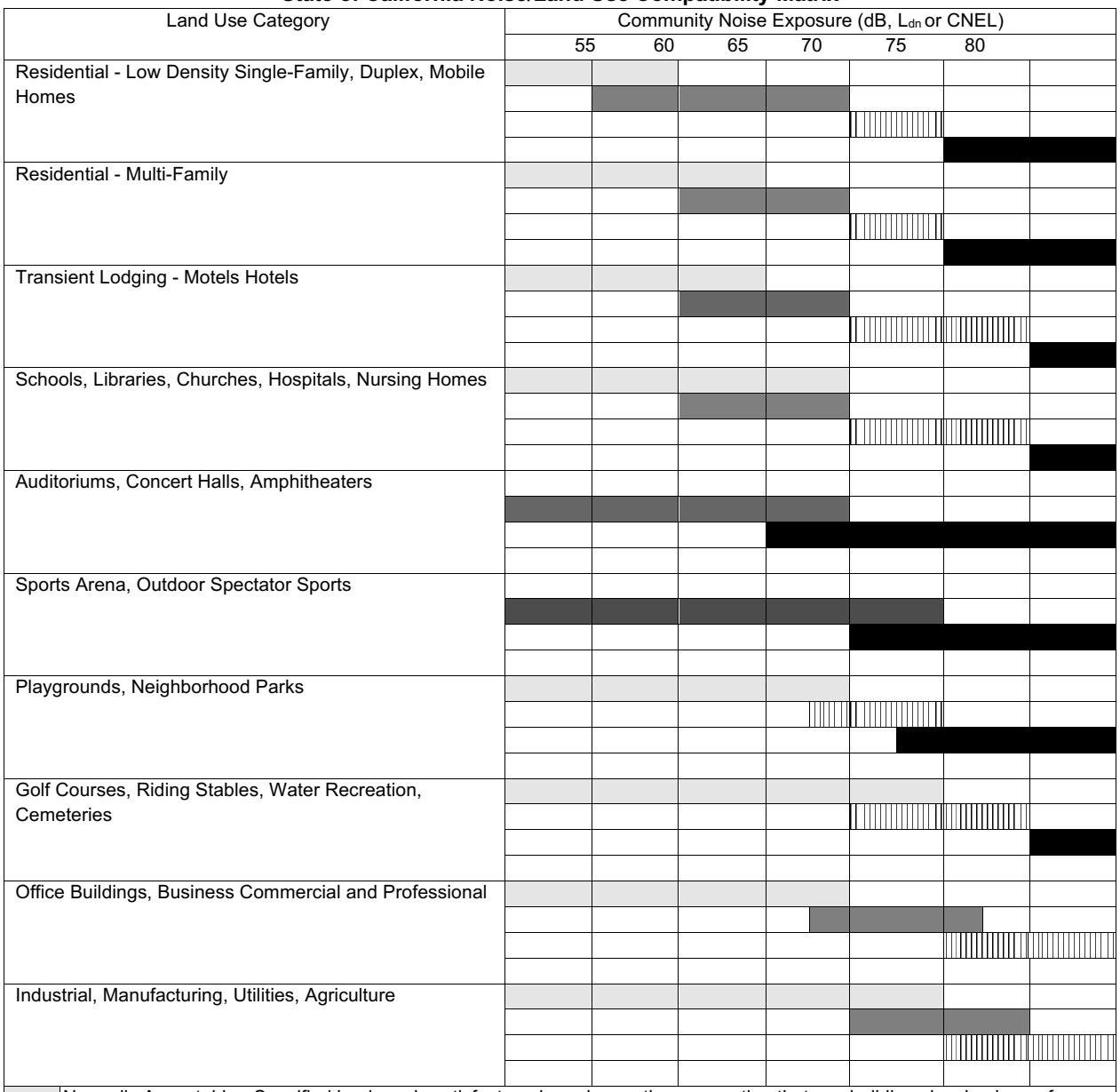
California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize Office of Noise Control guidelines, and analyze and quantify current and projected noise levels.

City of Los Angeles General Plan Noise Element. The City of Los Angeles General Plan includes a Noise Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts. However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in **Table 4.13-2**, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels." It also includes a policy that is relevant for the Project:

- Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

City of Los Angeles Municipal Code. The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary activities. Section 41.40(a) would prohibit construction activities between 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 A.M. to 9:00 P.M., and 8:00 A.M. to 6:00 P.M. on Saturdays or national holidays.

Table 4.13-2
State of California Noise/Land Use Compatibility Matrix



Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA 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;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

The LAMC also provides regulations regarding vehicle-related noise, including Sections 114.02, 114.03, and 114.06. Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City in a manner that would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA. Section 114.03 prohibits loading and unloading causing 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. Section 114.06 requires vehicle theft alarm systems to be silenced within five minutes.

Existing Conditions

Noise Sensitive Receptors

The Project Site is located on a commercial portion of the Mission Road corridor in East Los Angeles. Noise-sensitive receptors close to the two staging areas on the Project Site and/or near the truck haul route on Mission Road include, but are not limited to, the following:

- Multi-family residences, Duke Street; 30 feet west of the Mission Road haul route.
- Multi-family residences, Commodore Street;140 feet west of the Mission Road haul route.
- Multi-family residences, Manitou Avenue; 140 feet west of the Mission Road haul route.
- Mission Plaza, multi-family residences, 2226-2230 Parkside Avenue; 115 feet northwest of the Project Site.
- East College Prep Charter School (3825 Mission Rd.), 285 feet southwest of the Project Site
- Pueblo De Los Angeles High School (3921 Selig Place), 415 feet south of the Project Site.
- Lincoln Park (3501 Valley Boulevard), 900 feet south of the Project Site.
- Multnomah Elementary School (2101 Indiana Avenue), 915 feet southeast of the Project Site.
- Lincoln High School (3501 Broadway), 1,100 feet west of the Project Site.
- Keck Medicine and Hospital of USC (1500 San Pablo Street), 2,800 feet south of the Project Site.

Other sensitive receptors, while further from the two staging areas, are located near the truck haul route on Mission Road, including but not limited to:

- Single-family residences; Superior Court; ten feet west of the Mission Road haul route.
- Multi-family residences, 3427-3467 Mission Rd.; 30 feet northwest of Mission Road haul route.

Existing Ambient Noise Levels

The Project Site is occupied by industrial buildings and surface parking lots. The proposed staging areas where handling and storage of imported soils would be located are currently used as surface parking. There is existing intermittent noise from the operation of the parking lots, including tire friction as vehicles navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[135] This includes traffic on Mission Road, which carries about 1,723 vehicles at Lincoln Park Avenue in the A.M. peak hour.[136]

In September 2022, DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors.[137] As shown in **Table 4.13-3**, noise levels along roadways near the Project Site and along the haul route on Mission Road ranged from 65.0 to 66.5 dBA L_{eq}, which was generally consistent with the traffic volumes and speeds on Mission Road.

135 World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf accessed March 18, 2021.

136 DKA Planning 2023, based on City database of traffic volumes on Mission Rd at Lincoln Park, https://navigatela.lacity.org/dot/traffic_data/manual_counts/LINCOLN.MISSION.190319.MAN.pdf, 2019 traffic counts adjusted by one percent growth factor to represent existing conditions.

137 Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

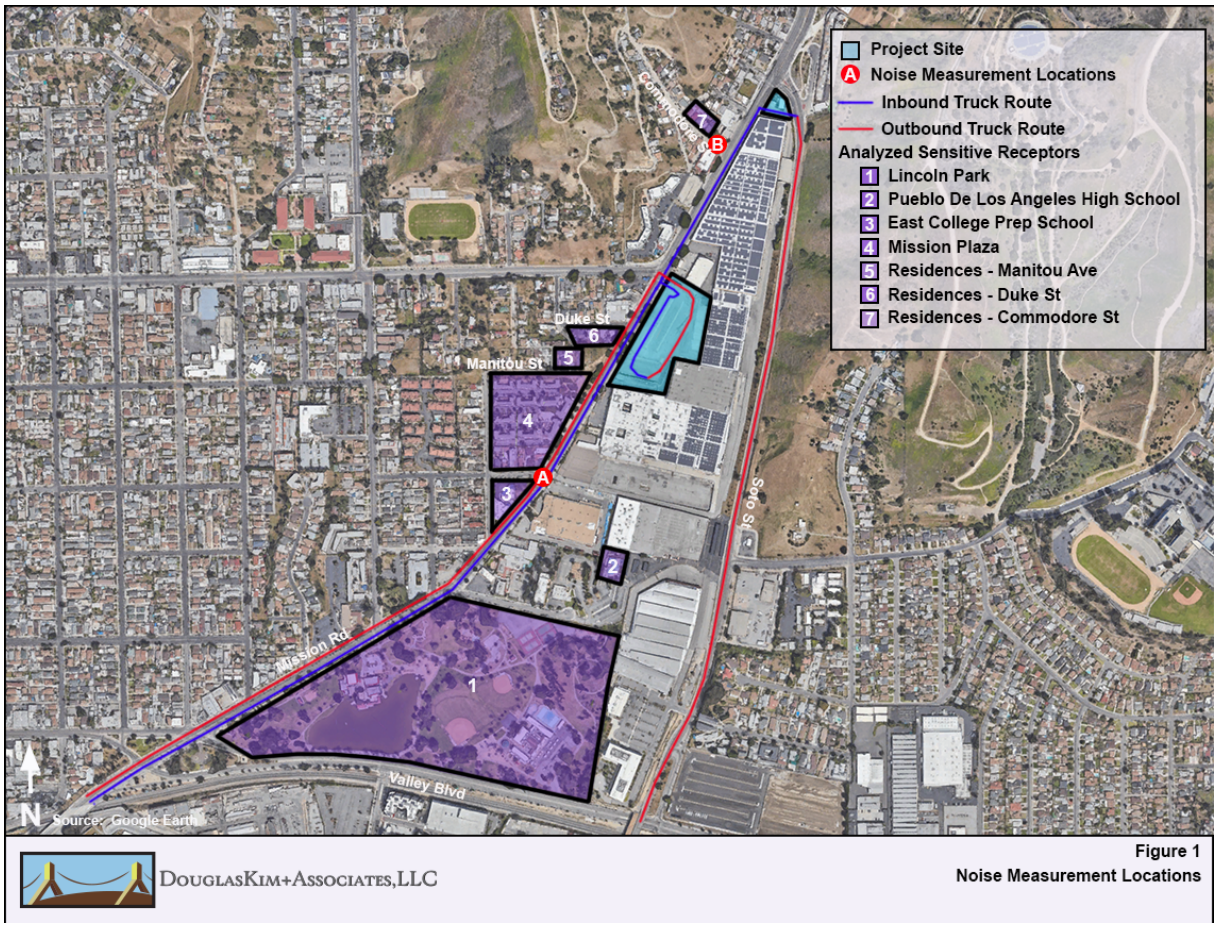
Table 4.13-3
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility [b]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 4077 Mission Rd.	Traffic on Mission Road	66.5	64.5	Residences – Commodore St.	Conditionally Acceptable
B. East College Prep	Traffic on Mission Road	65.0	63.0	Lincoln Park, Pueblo De Los Angeles High School, East College Prep School, Mission Plaza, Residences – Manitou and Duke	Conditionally Acceptable

[a] Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.
[b] Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 4.13-2 above for definition of compatibility designations.
Source: DKA Planning, 2023

Figure 4.13-1 illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-hour CNEL noise levels are generally considered "Conditionally Acceptable" for the types of land uses (e.g., schools, residences) near the Project Site.

Figure 4.13-1
Noise Measurement Locations



Methodology

On-Site Activities. Noise levels at off-site sensitive receptors were modeled employing the ISO 9613-2 sound attenuation methodologies using the SoundPLAN Essential model (version 5.1). This software package considers reference equipment noise levels, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. Noise sources from materials handling were modeled as area sources to reflect the mobile nature of construction equipment. This equipment would also occasionally operate at reduced power and intensity to maintain precision at these locations. On-site circulation of haul trucks were modeled as a line source to reflect the internal circulation of incoming and outgoing trucks at both the west and north staging areas.

Off-Site Noise Activities. The Project's off-site construction noise impact from haul trucks, worker commutes, and other vehicles accessing the Project Site was analyzed using the SoundPLAN Essential model (version 5.1). The circulation of incoming and outgoing haul trucks were modeled as line sources.

Thresholds of Significance

Short-Term Noise Thresholds. Based on guidelines from the City of Los Angeles City Department of Planning, the on-site construction noise impact would be considered significant if:

- Short-term activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Short-term activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Short-term activities of any duration would exceed the ambient noise level by 5 dBA (hourly L_{eq}) at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.

Because the Project's activities would occur for more than three months, the applicable City threshold of significance for the Project's noise impacts is an increase of 5 dBA over existing ambient noise levels.

On-Site Activities

Activities at the Project Site would generate noise during the six-month soil import period, including haul truck queuing and travel within each of the two staging areas, dumping of material, and materials handling equipment (e.g., rubber tire dozer). Dust-suppressing water trucks would also operate regularly. Noise-generating activities would generally occur at the Project Site between 7:00 A.M. and 5:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, activity would be permitted to occur between 8:00 A.M. and 6:00 P.M., though no weekend activity is planned.

Off-Site Activities

The Project would generate noise along the haul route as trucks exit from the Golden State Freeway (I-5) and travel northbound on Mission Road to the Project Site. About 60 percent of incoming trucks would turn into the Project Site at the west staging and queuing area across from Broadway Street. After circulating within the staging area and dumping off a load, outgoing trucks would exit at the same signalized intersection before heading southbound on Mission Road back to the freeway. Another 40 percent of incoming trucks would continue northbound on Mission Road before turning into the north staging and queuing area. Outgoing trucks would exit onto Soto Street to head southbound back to the freeway.

As summarized in **Table 4.13-4**, construction noise impacts at off-site sensitive receptors would not be elevated by 5 dBA or more, the threshold of significance for these activities. These impacts would be considered less-than-significant.

Figure 4.13-2 illustrates how noise from on- and off-site activities would propagate from the two queuing areas and Mission Road, respectively.

Figure 4.13-2
Noise Sound Contours

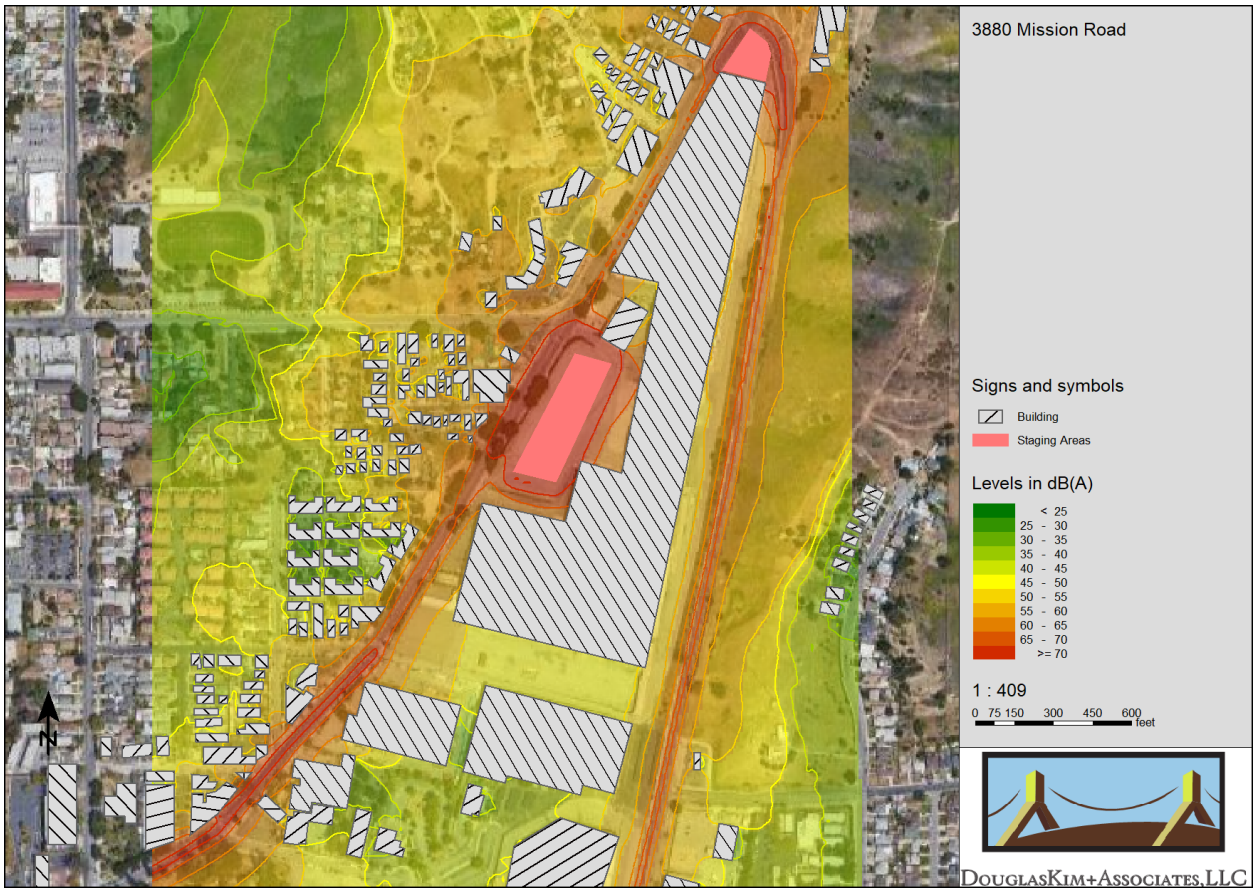


Table 4.13-4
Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. Lincoln Park	62.5	65.0	66.9	1.9	No
2. Pueblo De Los Angeles High School	41.4	65.0	65.0	0.0	No
3. East College Prep School	63.4	65.0	67.3	2.3	No
4. Mission Plaza Residences	57.8	65.0	65.8	0.8	No
5. Residences – Manitou Ave.	56.9	65.0	65.6	0.6	No
6. Residences – Duke St.	65.1	65.0	68.1	3.1	No
7. Residences – Commodore St.	57.8	66.5	67.0	0.5	No
Source: DKA Planning, 2023.					

Approximately 11.4 outbound trucks would travel on southbound on Soto Street southbound toward the I-5 freeway. Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.[138] As such, these trucks would be the equivalent of 218 PCE trips on Soto Street, an 11.9 percent increase in vehicle travel on this arterial, which carries about 1,831 peak hourly vehicles at Multnomah Street.[139] Because it takes a doubling (100 increase) of vehicle travel on a roadway to elevate noise levels by 3 dBA, these truck trips would generate a negligible increase in ambient noise levels, far below the 5 dBA threshold of significance.

Consistency with City General Plan Noise Element

While the City's Noise Element focuses on a number of measures for Citywide implementation by municipal government, there is one policy that is applicable to short-term activities like the Project. **Table 4.13-5** summarizes the Project's consistency with these.

Table 4.13-5
Project Consistency with City of Los Angeles General Plan Noise Element

Project	Project Consistency
Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.	**Consistent.** The Project would comply with City, state, and other applicable noise regulations to ensure that noise impacts are considered less than significant. As summarized in Table 4.13-4, noise impacts would be less than significant at nearby sensitive receptors.
Source: DKA Planning, 2023.	

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

Less Than Significant Impact.

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.[140] Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent

138 Caltrans, Technical Noise Supplement Table 3-3, 2013.

139 DKA Planning 2023, based on City database of traffic volumes on Soto Street at Multnomah Street, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/SOTO.MULTNOMAH.180607-AUTO.pdf; 2018 traffic counts adjusted by one percent growth factor to represent existing conditions.

140 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).[141]

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.[142] The threshold of human perception of vibration is approximately 0.01 to 0.02 in/sec PPV.[143]

Federal Transit Administration

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, county, or City standards specific to temporary construction activities. Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table 4.13-6** shows the FTA's vibration guidelines for building and structural damage.

Table 4.13-6
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require haul trips to import soils from donor sites. Haul trucks would generate occasional noise events at receptors during passbys, but such intermittent noise events would have a limited effect

141 Ibid.

142 Caltrans, Transportation and Construction Vibration Guidance Manual, April 2020.

143 Ibid.

on surrounding ambient noise levels on Mission Road or Soto Street. As a result, the Project's off-site construction noise impact from haul trucks would be consistent with the LAMC.

As discussed earlier, construction of the Project would generate trips from haul trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.[144] According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would be less than significant.

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

No Impact.

The Project Site is not located in the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport. The nearest airport is San Gabriel Valley Airport, 9 miles east of the Site. Thus, implementation of the Project would not expose people residing or working in the area of the Project Site to excessive noise levels. Therefore, no impact would occur.

Cumulative Impacts

During the six-month duration of the Project, there could be construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can affect noise-sensitive uses within 500 feet, based on the City's screening criteria. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between.

There are four potential Area Projects identified by the City of Los Angeles within 0.5 miles of the Project (**Table 4.13-7**).

144 Federal Transit Administration, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

Table 4.13-7
Area Projects Within 0.5 Miles of Project Site

#	Address	Distance to Site (Distance to Haul Route)	Use	Size	Status
1	2730 N. Onyx Drive	375 feet northwest (300 feet from Mission Rd. haul route)	Residential	32 units	To be constructed
2	3601 N. Mission Road	1,075 feet southwest (20 feet from Mission Rd. haul route)	Residential	185 units	To be constructed
3	1321 N. Mission Road	4,000 feet southwest (10 feet from Mission Rd. haul route)	Residential	300 units	To be constructed
4	SEC Mission Road / Zonal Avenue	4,750 feet southwest (10 feet from Mission Rd. haul route)	Residential	1,400 units	General Hospital to be converted

Sources:
Nos.1 and 2: Area Projects List, Area Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, December 7, 2022.
No. 2: https://la.urbanize.city/post/seven-story-184-unit-apartment-complex-proposed-3601-mission-road
No. 3: https://la.urbanize.city/post/county-owned-site-1321-mission-road-lincoln-heights-redevelopment
No. 4: https://la.urbanize.city/post/la-county-seeks-more-funding-general-hospital-redevelopment
https://www.latimes.com/california/story/2022-11-27/planning-the-rebirth-of-a-mothballed-l-a-landmark: Construction of the General Hospital conversion to supportive and affordable housing units would start in 2024 at the earliest, with completion in 2026.

Of these, only one (Area Project No. 1) is within 1,000 feet of the Project Site, with the potential to cumulatively impact sensitive receptors along Mission Avenue. As illustrated in **Table 4.13-8**, the cumulative noise impacts at the analyzed sensitive receptors would not be considered significant, as they would not exceed 5.0 dBA L_{eq}.

These cumulative noise levels at analyzed sensitive receptors are negligibly higher than impacts from the Project alone at residences on Commodore Street. More distant Area Projects have minimal impact on construction noise levels due to intervening structures that shield noise from more distant construction sites. Based on this, there would not be cumulative noise impacts at any nearby sensitive uses located near the Project Site and Area Projects in the event of concurrent construction activities.

Table 4.13-8
Cumulative Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. Lincoln Park	62.5	65.0	66.9	1.9	No
2. Pueblo De Los Angeles High School	41.4	65.0	65.0	0.0	No
3. East College Prep School	63.4	65.0	67.3	2.3	No
4. Mission Plaza Residences	57.8	65.0	65.8	0.8	No
5. Residences – Manitou Ave.	56.9	65.0	65.6	0.6	No
6. Residences – Duke St.	65.1	65.0	68.1	3.1	No
7. Residences – Commodore St.	58.4	66.5	67.1	0.6	No
Source: DKA Planning, 2023.					

Construction-related noise levels from any Area Project would be intermittent and temporary. As with the Project, any Area Projects would comply with the LAMC's restrictions, including restrictions on construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual Area Project and compliance with the noise ordinance.

Other concurrent activities from Area Projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any Area Project(s) were to utilize the same roadways. Distributing trips to and from each Area Project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA.

The Project would generate about 200 loads daily, or about 28.6 incoming truck trips per hour that travel northbound on Mission Road from the I-5 freeway. About 17.1 outgoing truck trips would travel back southbound on Mission Road to return to the freeway, while the remainder who travel on Soto Avenue. These 45.7 truck trips on Mission Road during a typical hour would represent about 874 PCE trips, or about 50 percent of traffic volumes on Mission Road, which carries about 1,723 vehicles at Lincoln Park Avenue in the A.M. peak hour.[145] Any Area Projects would have to add 849 peak hour vehicle trips to double volumes on Mission Road and elevate ambient noise levels by 3 dBA.

[145] DKA Planning 2023, based on City database of traffic volumes on Mission Rd at Lincoln Park, https://navigatela.lacity.org/dot/traffic_data/manual_counts/LINCOLN.MISSION.190319.MAN.pdf, 2019 traffic counts adjusted by one percent growth factor to represent existing conditions.

The four Area Projects within 5,000 feet of the Project Site would add to local traffic from construction-related vehicles and haul trucks. These Area Projects would have to add an hourly average of 212 PCE trips to Mission Road to elevate traffic noise levels by 3 dBA and even more to elevate 5 dBA, the threshold of significance for short-term impacts. The following impacts are anticipated:

- No. 1, 2730 North Onyx Drive. This 32-unit residential project would likely use Soto Street to access the Project Site, given its more direct link to the I-10 freeway and Valley Boulevard to the south.

- No. 2, 3601 North Mission Road. Construction vehicles and haul trucks for this 185-unit residential project would use Mission Road as access.

- No. 3, 1321 North Mission Road. Construction vehicles and haul trucks for this 300-unit residential project would generally not use the same stretch of Mission Road, as this project is just east of the I-5 freeway, with relatively direct access to the freeway that minimizes travel on local roads.

- No. 4, Mission Road and Zonal Avenue. Construction vehicles and haul trucks for this 1,400-unit residential project would generally not use the same stretch of Mission Road, as this project is also just east of the I-5 freeway, with relatively direct access to the freeway that minimizes travel on local roads.

Of these four projects, the Area Project at 3601 North Mission Road could contribute traffic volumes to Mission Road. However, the construction of this apartment development is unlikely to generate 849 PCE trips in a given hour, the equivalent of 44.5 haul truck trips. As such, cumulative noise due to construction truck traffic from the Project and Area Projects do not have the potential to double traffic volumes on Mission Road necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for operational traffic impacts.

On Soto Street, the Area Project at Onyx Drive would have to add 1,831 PCE trips per hour to Soto Street to double traffic volumes and elevate ambient noise levels by 3 dBA.[146] This 32-unit housing project is not of the scale necessary to generate such a substantial amount of construction traffic. As such, cumulative noise due to construction truck traffic from the Project and Area Projects do not have the potential to double traffic volumes on Soto Street necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for operational traffic impacts. Therefore, cumulative noise impacts from off-site construction would be less than significant.

Concerning vibration, the Project would generate construction-related groundborne vibrations at nearby structures that are below thresholds associated with building damage. Accordingly, there

[146] DKA Planning 2023, based on City database of traffic volumes on Soto Street at Multnomah Street, https://navigatela.lacity.org/dot/traffic_data/automatic_counts/SOTO.MULTNOMAH.180607-AUTO.pdf; 2018 traffic counts adjusted by one percent growth factor to represent existing conditions.

is no potential for cumulatively considerable vibration impacts at shared receptors and impacts would be less than significant.

4.14 Population And Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact.

The import activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project Site area and would not induce unplanned population growth and/or require permanent housing. Therefore, no impact would occur.

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

No Impact.

The Project Site contains existing warehouse, logistics, and light industrial buildings, no housing is on the Project Site, and no people live at the Site. Thus, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

Cumulative Impacts

Some of the Area Projects would result in a net increase in the number of housing units and associated population and the amount of employment in the Project Site area and would contribute to growth in the City. The Project would not result in unplanned growth. Thus, the Project would not have the potential to contribute to any cumulative impacts related to unplanned growth. Therefore, cumulative impacts related to unplanned growth would be less than significant.

4.15 Public Services

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

a) Fire protection?

No Impact.

Within the City of Los Angeles, fire prevention and suppression services and emergency medical services are provided by the Los Angeles Fire Department (LAFD). Project impacts regarding fire protection services are evaluated on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration.

Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. The evaluation of the Project's impact on fire protection services considers whether the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand, the construction of which would cause significant environmental impacts.

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 of the LAMC regarding fire flow requirements.

LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles

for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

According to LAMC Section 57.512.1,147 response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3 (recreated below).148

This Project would be a high density development. For a high density residential land use, the maximum response distance is 1.5 mile for an engine company and 2 miles for a truck company. The maximum response distances for both fire suppression companies (engine and truck) must be satisfied. According to LAMC Section 57.512.2149, where a response distance is greater than that shown in Table 57.507.3.3 (table recreated below), all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

Table 57.507.3.3
Response Distances That If Exceeded Require The Installation Of An Automatic Fire Sprinklers System

* Land Use	Required Fire-Flow	Maximum Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
High Density Residential and Commercial Neighborhood	4,000 gpm from four adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four hydrants flowing simultaneously	1 mile	1-1/2 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required)	3/4 mile	1 mile

gpm – gallons per minute
Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles.
The maximum response distances for both L.A.F.D. fire suppression companies (engine and truck) must be satisfied.
LAMC Table 57.507.3.3.

147 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512.
148 LAMC Table 57,507.3.3, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JDTABLE57.507.3.3
149 LAMC Section 57,512.2, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512.2.

According to the City, the Project Site is first-served by Station No. 29,150 located at 4029 Wilshire Boulevard, approximately 1.1 miles driving distance away.

As shown in **Table 4.15-1**, Fire Station No. 1 has a light force (composed of a truck company and engine company).[151] Therefore, the Project Site is located within the distance identified by LAMC Section 57.512.1152 (i.e. within 1.0 mile for an engine and 1.5 miles for a truck).

Since the Project Site is located within the distance identified by LAMC Section 57.507.3.3, it does not need automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

Table 4.15-1
Fire Stations

No.	Address	Distance	Equipment	Operational Response Time	Incident Counts
1	2230 Pasadena Ave.	1.3 miles	Light Force Assessment Engine Paramedic Ambulance Rescue Ambulance	EMS: 7:40 min Non-EMS: 7:46 min	EMS: 3,220 Non-EMS: 1,257
47	4575 Huntington	0.75 miles	Engine Paramedic Ambulance Brush Patrol	EMS: 7.37 min Non-EMS: 6:54 min	EMS: 1,909 Non-EMS: 384

Response Time: (January to December 2022) average time (turnout time + travel time) in the station area.
Incident counts: (January to December 2022). Non-EMS is fire emergency. EMS is emergency medical service.
http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf
Light Force: Truck company and single engine.
Task Force: Truck company and two fire engines.
LAFD June 2021 Fire Station Directory.
Table: CAJA Environmental Services, January 2023.

The Project Site is in an urbanized area completely surrounded by development. The Project Site is not located in a Very High Fire Hazard Severity Zone[153] or in the wildlands fire hazard Mountain Fire District.[154]

The Project Site is not within Fire District 1.[155] These are areas identified by the City that are required to meet additional developmental regulations to mitigate fire hazard related risks. There

150 LAFD, Find Your Station: https://www.lafd.org/fire-stations/station-results

151 LAFD: http://www.lafd.org/about/about-lafd/apparatus.

152 LAMC Section 57,512.1, http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512.

153 ZIMAS search: http://zimas.lacity.org/.

154 Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed July 19, 2021.

155 http://zimas.lacity.org, accessed January 10, 2023.

are nine areas located in Downtown, Hollywood, Wilshire, Beverly-Fairfax, Crenshaw, Century City, Westwood, Van Nuys, Venice, and San Pedro areas of the City. Fire District 1 limits the type of construction as defined in the California Building Code (CBC) to Types I, II and III, prohibits Types IV and V construction, and provides for additional fire life safety requirements. Fire District 1 is a building code provision found in Chapter 9, Article 1, Division 72 of the LAMC (Section 91.7201.1).156

LAMC Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas, with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development. Final fireflow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project by LAFD during the plan check process. If the Project is determined to require one or more new hydrants during plan check in accordance with city standards, the Project would have to provide them.

The following fire hydrants are near the Project Site:157

- Hydrant (ID 10671, size 2 ½ x 4D, 12-inch main), located on the southeast corner of Mission Road and Baldwin Street, on the southwest portion of the Project Site.
- Hydrant (ID 3278, size 2½ x 4D, 12-inch main), located on the east side of Mission Road south of Broadway, in the western portion of the Project Site.
- Hydrant (ID 10672, size 2½ x 4D, 12-inch main), located on the east side of Mission Road, north of Broadway, in the western portion of the Project Site.
- Hydrant (ID 9206, size 2½ x 4D, 24-inch main), located on the east side of Mission Road, south of Commodore Street, in the western portion of the Project Site.
- Hydrant (ID 9205, size 2½ x 4D, 24-inch main), located on the east side of Mission Road, at Commodore Street, in the northwestern portion of the Project Site.
- Hydrant (ID 9203, size 2½ x 4D, 24-inch main), located on the east side of Mission Road, at Superior Court, in the northwestern portion of the Project Site.

156 LADBS, Report Relative to Expanding Fire District 1, May 27, 2021: https://clkrep.lacity.org/onlinedocs/2019/19-0603_rpt_dbs_%205-27-21.pdf

157 Navigate LA, DWP (Fire Hydrants) Layer: http://navigatela.lacity.org/navigatela/

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[158]

Therefore, no impact would occur.

Cumulative Impacts

Implementation of the Area Projects could result in a net increase in the number of residents and employees in the area of the Project Site and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the Project, the Area Projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and Area Projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

b) Police protection?

No 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 objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) Central Bureau, Hollenbeck Community Police Station, located at 2111 E. 1st Street, is approximately 2.5 miles driving

158 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

distance from the Project Site. The Station service area is 15.2 square miles in size has approximately 200,00 residents.[159]

There are no immediate plans to increase LAPD staffing or resources in those areas, which would serve the Project. The Project would not add any permanent residents to the area.

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site.

The Project Site has a fence around its boundaries. This screens 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 ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. Therefore, no impact would occur.

Cumulative Impacts

Implementation of the Area Projects could result in a net increase in the number of residents and employees in the area of the Project Site and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the Area Projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and Area Projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

c) Schools?

No Impact.

The Project would involve the import of soil. The Project would not include development of any land uses that would generate school-aged children. Thus, the Project would not result in a direct demand for school services. Therefore, no impact would occur.

Cumulative Impacts

The Area Projects could result in an increase in the number students in the Project Site area. However, similar to the applicant of the proposed Project, the applicants of all the Area Projects

159 LAPD: https://www.lapdonline.org/lapd-contact/central-bureau/hollenbeck-community-police-station/

would be required to pay the applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

d) Parks?

No Impact.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons).

A significant impact to parks would 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 would involve the import of soil. Thus, the Project would not result in a direct demand for parks services. Therefore, no impact would occur.

Cumulative Impacts

The Area Projects listed could result in an increase demand for parks and recreational services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of the Area Projects that consist of residential dwelling units would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

e) Other public facilities?

No Impact.

A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[160]

Thus, the Project would not result in a direct demand for library services. Therefore, no impact would occur.

[160] LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts.

Cumulative Impacts

Implementation of the Area Projects could increase the demand for library services in the area of the Project Site. The related residential projects would be subject to the standards to determine demand for library facilities used by the City and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

4.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

No Impact.

As discussed in response to Checklist Question 15(d) (Public Services – Parks), the Project would involve the import of soil. Thus, the Project would not result in a direct demand for parks services. Therefore, no impact would occur.

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?

No 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. The Project would involve the import of soil. Thus, the Project would not result in a direct demand for parks services. Therefore, no impact would occur.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question 15(d) (Public Services – Parks). As discussed there, cumulative impacts related to parks and recreational facilities would be less than significant.

4.17 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

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

No Impact.

The Project would involve the import of soil. Haul trucks would use Mission Road and Soto Street to access the Site from the nearby freeways. These roadways are wide and broad and able to support the trucks. The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, no impact would occur.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)? (Would vehicle miles traveled exceed an applicable threshold of significance?)

No Impact.

This question was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts. CEQA Appendix G was revised to incorporate Section 15064.3, Section 15064.3 and become applicable statewide on July 1, 2020.

According to the LADOT, construction impacts are considered part of the non-CEQA transportation analysis.[161] The following is for informational purposes only.

Construction would not impede access to any existing public transit stops or rerouting of a bus route.

Construction staging and worker parking would occur onsite. Therefore, no intermittent closure of the travel lane on Mission Road is expected. Flag persons would be present to maintain traffic operations should the travel lane be closed or trucks need to impede traffic. Additional temporary traffic controls would be provided to direct traffic around any closures and to maintain emergency access, as required.

Construction traffic would include worker trips and import haul trips. Construction workers generally arrive at and depart from the worksite outside of peak traffic hours. Project construction would result in varying levels of truck and worker traffic to and from the Project Site on a daily basis. The haul trips would occur during the permissible hauling hours identified by the Department of Building and Safety. Thus, it is not anticipated that construction traffic trips would contribute to a significant increase in the overall congestion in the Project Site vicinity.

No VMT analysis is required since the operations at the Project Site are not changing with the Project. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). No impact would occur.

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

No Impact.

A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Construction Impact

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. In coordination with LADOT, the Project will implement the following:

- Maintain access for land uses in the vicinity of the Project Site during construction.
- Schedule construction materials deliveries during off-peak periods to the extent practical.

[161] Transportation Assessment Guidelines, LADOT, August 2022.

- Organize deliveries and staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to surrounding roadways.

- Coordinate deliveries to ensure trucks do not wait to unload or load and impact surrounding roadways, and if needed, utilize an off-site staging area.

- Control truck and vehicle access to the Project Site with flagmen.

- Limit lane closures to the maximum extent possible and avoid peak period hours to the extent possible. Where such closures are necessary, the Worksite Traffic Control Plan will identify the location of lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity.

- Parking for construction workers will be provided on-site.

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site. Therefore, no impact would occur.

d) Result in inadequate emergency access?

No Impact.

Import and staging activities would be confined to the Project Site and would not affect emergency access. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Therefore, no impact would occur.

Cumulative Impacts

Cumulative VMT impacts are evaluated through a consistency check with SCAG's RTP/SCS, which is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. Per the City's TAG, projects that are consistent with the RTP/SCS in terms of development location and density are part of the regional solution for meeting air pollution and GHG emissions reduction goals. Projects that have less-than-significant VMT impact are deemed to be consistent with the SCAG's RTP/SCS and would have a less-than-significant cumulative impact on VMT.

4.18 Tribal Cultural Resources

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

The analysis in this section is based primarily on the following (refer to **Appendix F**):

F-1 Sacred Lands File & Native American Contacts List Request, Native American Heritage Commission

F-2 Sacred Lands File Response, Native American Heritage Commission, February 2, 2023

F-3 AB 52 Tribal Consultation Request, Los Angeles Department of City Planning, December 20, 2022

F-4 AB 52 Tribal Response, Fernandeño Tataviam Band of Mission Indians, January 13, 2023

F-5 AB 52 Tribal Response, Fernandeño Tataviam Band of Mission Indians, February 15, 2023

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact.

A significant impact would occur if the project would 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, which is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The site is not 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(l).

The Project would involve the import of soil to partially fill in a single-level subterranean parking level and basement areas associated with existing warehouse, logistics, light industrial and office buildings (the remainder of the fill will come from on-site sources. There is no historic structure on the Site. According to ZIMAS, the Project Site does not require historic preservation review.[162]

On January 13, 2023, Planning Staff received an email from Sarah Brunzell, on behalf of the Cultural Resources Management (CRM) Division of the Fernandeño Tataviam Band of Mission Indians (FTBMI), indicating that its office would like to consult on the Proposed Project. The Native American Heritage Commission Letter regarding the Sacred Lands File Search, the Geotechnical Investigation Report, and the LADBS Soils Report Approval Letter were submitted to the FTBMI for review. Subsequently, on February 15, 2023, after reviewing the requested items, the FTBMI indicated that no further consultation pursuant to CEQA is required unless there is an unanticipated discovery of cultural resources during project implementation. The Project involves grading and import of approximately 344,000 cubic yards of soil to the Project Site. In the event subsurface cultural resources are unearthed, the Project would comply with City regulations on how artifacts found during construction must be handled. As such the potential for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe would be less than significant and no mitigation measures are required.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

162 HistoricPlacesLA: http://www.historicplacesla.org/map, accessed January 20, 2023.

Less Than Significant Impact.

Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an ND, MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

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. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

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. An informational letter was mailed to a total of 10 Tribes known to have resources in this area, on December 20, 2022, describing the Project and requesting any information regarding resources that may exist on or near the Project site.

On January 13, 2023, Planning Staff received an email from Sarah Brunzell, on behalf of the Cultural Resources Management (CRM) Division of the Fernandeño Tatviam Band of Mission Indians (FTBMI), indicating that its office would like to consult on the Proposed Project. The Native American Heritage Commission Letter regarding the Sacred Lands File Search, the Geotechnical Investigation Report, and the LADBS Soils Report Approval Letter were submitted to the FTBMI for review. Subsequently, on February 15, 2023, after reviewing the requested items, the FTBMI indicated that no further consultation pursuant to CEQA is required unless there is an unanticipated discovery of cultural resources during project implementation. The Project involves grading and import of approximately 344,000 cubic yards of soil to the Project Site. In the event

subsurface cultural resources are unearthed, the Project would comply with City regulations on how artifacts found during construction must be handled. As such the potential for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe would be less than significant and no mitigation measures are required.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the Area Projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the Area Projects. In addition, all other projects would be subject to separate environmental review as applicable, and other mitigation measures regarding discovery and handling of tribal resources would be implemented as necessary to mitigate any potential impacts. As such, the Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

4.19 Utilities And Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

No Impact.

The Project would involve the import of soil to the Project Site. The Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, no impact would occur.

Cumulative Impacts

Implementation of the Project in conjunction with the Area Projects could result in an increased cumulative on water conveyance infrastructure. It should be noted that any amount does not take into account the net decrease in water consumption (and wastewater generation) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption (and wastewater generation).

As with the Project, the applicants of the Area Projects would be subject to review by LADWP to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development in the City is subject to LADWP and City requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development in the City is required to comply with Fire Code requirement for fire flow and other fire protection requirements and are subject to ongoing evaluations by LADWP, the City's Department of Public Works, and the Los Angeles Fire Department to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Wastewater Treatment

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd. Thus, there is approximately 175 mgd available capacity.

The Project would involve the import of soil and would not generate wastewater. Therefore, no impact would occur.

Cumulative Impacts

Implementation of the Area Projects could increase the need for wastewater treatment. It should be noted that any amount does not take into account the net decrease in wastewater generation (and water consumption) that would occur as a result of removal of existing uses or the effectiveness of water conservation measures required in accordance with the City's Green Building Code, both of which would likely substantially reduce the cumulative water consumption and wastewater generation. With a remaining treatment capacity of approximately 175 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater treatment impacts would be less than significant.

Storm Water Drainage Facilities

As discussed in response to Checklist Question 10(c)(iii), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electric Power Facilities

As discussed in response to Checklist Question 6(a), the Project would have no impact related to electric power facilities.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic 6 (Energy).

Natural Gas Facilities

As discussed in response to Checklist Question 6(a), the Project would have no impact related to natural gas facilities.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic 6(Energy).

Telecommunications Facilities

In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site is served by existing telecommunications facilities that are available in the Project Site area and would not require new or expanded facilities. Therefore, no impact would occur.

Cumulative Impacts

All of the Area Projects would be located in a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the Area Projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the Area Projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the Area Projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

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

No Impact.

The City receives water from five major sources: 1) the Eastern Sierra Nevada watershed, via the Los Angeles Aqueduct (LAA); 2) the Colorado River, via the Colorado River Aqueduct; 3) the Sacramento-San Joaquin Delta, via the State Water Project (SWP) and the California Aqueduct; 4) local groundwater; and 5) recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand.

According to LADWP, any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the most recently

adopted Urban Water Management Plan (UWMP), which is prepared by the LADWP to ensure that existing and projected water demand within its service area can be accommodated.

According to Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (2020 UWMP), the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Yet, a Single Dry Year, and Multiple Dry Years. The 2020 UWMP also includes a drought risk assessment, which shows that there would be no water shortages over the five-year drought, which started in 2021 (2020 UWMP, page 11-13). As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP.

The Project would involve the import of soil. The Project would not require new or additional water supply or entitlements. Therefore, no impact would occur.

Cumulative Impacts

LADWP (through its UWMP) anticipates that its projected water supplies will meet demand through the year 2045. In terms of the City's overall water supply condition, any Area Project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any Area Project that conforms to the demographic projections from SCAG's RTP/SCS and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands. Similar to the Project, each Area Project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Area Projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA review process. The CEQA analysis would compare the existing to the proposed uses and the ability of LADWP supplies and infrastructure to provide a sufficient level of water service. Future development projects within the service area of the LADWP would be subject to the water conservation measures outlined in the City's Green Building Code, which would partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water would be less than significant.

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?

No Impact.

As discussed in response to comment 19(a), Project impacts related to wastewater treatment would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact.

The Project's demolition and construction debris would primarily be classified as inert waste and would be recycled in accordance with the Citywide [Construction and Demolition] C&D Waste Recycling Ordinance, which requires all mixed C&D waste generated within City limits to be taken to a City-certified C&D waste processor for recycling, and with LAMC Section 66.32, which requires 70 percent of solid waste (including C&D debris) generated in the City to be recycled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that would guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor would utilize solid waste haulers, contractors, and recyclers who have obtained an AB 939 Compliance Permit (i.e., Waste Hauler Permit) from LASAN.

Furthermore, recycling facilities in the Los Angeles region (such as American Waste Transfer Station, Compton Recycling and Transfer Station, Carson Transfer Station and Materials Recovery Facility, Waste Resources Recovery, Falcon Refuse Center Inc., and the Southeast Resource Recovery Facility) would receive recyclable construction waste. Additional recycling facilities and inert waste landfills (which are able to accept fill dirt, concrete, glass, etc.) are listed in the City's Department of Sanitation's Construction and Demolition Recycling Guide and would be utilized as needed.

The Project would involve the import of soil. The Project would not generate other construction debris. Therefore, no impact would occur.

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

No Impact.

State regulation AB 939 required every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

The Project would be required to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance, the Curbside Recycling Program, and Zero Waste Plan, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

As with the Project, all of the Area Projects would be required by the City to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance, the Curbside Recycling Program, and Zero Waste Plan, and no impacts related to this issue would occur as a result of cumulative development.

4.20 Wildfire

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

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

No Impact.

The Project Site is not located in a Very High Fire Hazard Severity Zone[163] or in the wildlands fire hazard Mountain Fire District. Therefore, no impact would occur.

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

No Impact.

The Project Site is not located in a Very High Fire Hazard Severity Zone[164] or in the wildlands fire hazard Mountain Fire District. The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. Therefore, no impact would occur.

[163] ZIMAS search: http://zimas.lacity.org/.

[164] ZIMAS search: http://zimas.lacity.org/.

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

No Impact.

The Project Site is not located in a Very High Fire Hazard Severity Zone[165] or in the wildlands fire hazard Mountain Fire District. Therefore, no impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact.

The Project Site is not located in a Very High Fire Hazard Severity Zone[166] or in the wildlands fire hazard Mountain Fire District. In addition, as previously discussed, the Project Site is not susceptible to potential flooding or landslides, nor would the Project result in potential drainage changes. Therefore, no impact would occur. Therefore, no impact would occur.

Cumulative Impacts

None of the Area Projects is located near lands that are classified as very high fire hazard severity zones.

[165] ZIMAS search: http://zimas.lacity.org/.

[166] ZIMAS search: http://zimas.lacity.org/.

4.21 Mandatory Findings Of Significance

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

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

No Impact.

As discussed under Checklist Topics 4.4 (Biological Resources) the Project would not 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 and 4.5 (Cultural Resources), or eliminate important examples of the major periods of California history or prehistory.

As discussed under Checklist Topic 4.18 (Tribal Cultural Resources), the Project would not have the potential to eliminate important examples of the major periods of California history or prehistory related to tribal cultural resources.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past

projects, the effects of other current projects, and the effects of probable future projects)?

No Impact.

As discussed throughout this IS/ND, the Project's contribution to cumulative impacts would not be considerable and therefore there is no impact.

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

No Impact.

As discussed throughout this IS/ND, the Project would not result in any direct or indirect adverse effects on human beings.