



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

# SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT

## 4112 Del Rey Avenue Project

Case Number: ENV-2022-9017-SCEA

**Project Location:** 4112 Del Rey Avenue (4112, 4120, 4130, 4132, 4134, and 4136 Del Rey Avenue), Los Angeles, CA 90292

**Community Plan Area:** Palms-Mar Vista – Del Rey

**Council District:** 11—Park

**Project Description:** The Project proposes the development of a new, six-story (66-foot-tall) mid-rise building consisting of 210 residential units and 33,793 square feet of open space. Of these units, 18 units (11 percent of the base density) would be designated as Very Low Income (VLI) units. The 123,359 square foot Project Site is currently improved with creative office and warehouse uses and associated surface parking which would be demolished as part of the Project. The Project would contain 253,974 square feet of floor area resulting in a floor area ratio (FAR) of 2.06:1. A total of 282 vehicular parking spaces would be provided within five above-grade parking levels. Access to the parking structure would be provided from a driveway off Dey Rey Avenue at the northwestern corner of the Project Site and would provide vehicular Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following: 1) Density Bonus Compliance Review pursuant to LAMC Section 12.22 A.25 and California Government Code Section 65915, including a density bonus of 35 percent, reduced parking requirements, and two on-menu incentives/concessions to allow a 35 percent increase in FAR and a one-story/11-foot building height increase; 2) Site Plan Review pursuant to LAMC Section 16.05 in connection with the proposed development of 50 or more new residential dwelling units; 3) Adoption of the Sustainable Communities Environmental Assessment (SCEA); and 4) Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

**PREPARED FOR:**

The City of Los Angeles  
Department of City Planning

**PREPARED BY:**

ESA

**APPLICANT:**

MDR Investors, LLC

**July 2023**

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# Chapter 1

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## Introduction

This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code (PRC).

Project Title: 4112 Del Rey Avenue Project

Project Location: 4112 Del Rey Avenue (4112, 4120, 4130, 4132, 4134, and 4136 Del Rey Avenue), Los Angeles, CA 90292

Lead Agency: City of Los Angeles Department of City Planning  
200 North Spring Street, Suite 525  
Los Angeles, CA 90012

City Staff Contact: More Song, City Planner  
213-978-1319

Applicant: LaTerra Development, LLC  
1880 Century Park East, Suite 1017  
Los Angeles, CA 90067

### 1. Project Summary

The subject of this SCEA is a proposed residential development known as the 4112 Del Rey Avenue Project. The Project Site is a rectangular-shaped parcel bordered by a multi-family apartment building to the north, commercial uses to the east, a FedEx Ship Center to the south, and Del Rey Avenue to the west. The Project Site is currently occupied by six one-story creative office and warehouse buildings and associated surface parking.

The Project proposes the development of a new, six-story (66-foot-tall) mid-rise building consisting of 210 residential units, including 33 studio units, 108 one-bedroom units, 53 two-bedroom units, and 16 three-bedroom units, and 33,793 square feet of open space. Of these units, 18 units (11 percent of the base density) would be designated as Very Low Income (VLI) units. The Project would contain 253,974 square feet of floor area resulting in a floor area ratio (FAR) of 2.06:1.

As indicated on ZIMAS, the Project Site is located within a City-designated Transit Priority Area (TPA), defined as an area within one-half mile of a major transit stop that is existing

or planned.<sup>1,2,3</sup> The Project Site is also located within a High Quality Transit Area (HQTA), due to its location within one-half mile of a major transit stop or high quality transit corridor (HQTC).

A total of 282 vehicular parking spaces would be provided within five above-grade parking levels. Access to the parking structure would be provided from a driveway off Dey Rey Avenue at the northwestern corner of the Project Site and would provide vehicular ingress and egress to the five above-ground parking levels. The parking structure would be wrapped by the residential uses.

The Project includes the development of common and private open space areas throughout the Project Site. Level 1 of the Project Site would include a fenced courtyard for Project residents located along the western frontage of the Project Site and Level 6 of the residential building would include a pool deck and spa area, sky lounge, gym/fitness center, outdoor kitchen/dining areas, firepits, and outdoor seating and cabanas for the Project's residents.

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

- Density Bonus Compliance Review pursuant to LAMC Section 12.22 A.25 and California Government Code Section 65915, including a density bonus of 35 percent, reduced parking requirements, and two on-menu incentives/concessions to allow a 35 percent increase in FAR and a one-story/11-foot building height increase;
- Site Plan Review pursuant to LAMC Section 16.05 in connection with the proposed development of 50 or more new residential dwelling units;
- Adoption of the Sustainable Communities Environmental Assessment (SCEA); and
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

## 2. Background Information on Senate Bill 375 and the SCEA

The State of California adopted Senate Bill 375 (SB 375), also known as “The Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that

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<sup>1</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>2</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>3</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations (MPOs) to incorporate a “sustainable communities strategy” (SCS) into the regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various California Environmental Quality Act (CEQA) streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA.

The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG’s Regional Council approved and adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2020), which sets forth goals, policies, and programs intended to reduce greenhouse gas emissions, improve active transportation, and promote development near existing transportation networks. On October 30, 2020, CARB signed Executive Order G-20-239, which determined that the Connect SoCal 2020 would meet the region’s GHG emissions reductions targets for 2035; accordingly, this SCEA assesses the Project in relation to Connect SoCal 2020.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the CEQA clearance for “transit priority projects” (as described below) that are consistent with SCAG’s Connect SoCal 2020.

### **3. Transit Priority Project Criteria**

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria (see PRC Section 21155 (a) and (b)):

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in Connect SoCal 2020;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 dwelling units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

### **4. SCEA Process and Streamlining Provisions**

Qualifying TPPs that have incorporated all feasible mitigation measures, performance standards or criteria set forth in the prior applicable EIR (SCAG’s Connect SoCal 2020 Program EIR) and that are determined to not result in significant and unavoidable

environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts of the TPP, except for the following:
  - a. Growth-inducing impacts, and
  - b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:
  - a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
  - b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
    - i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
    - ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

## 5. Required Findings

Based on a review of the entire administrative record, the City of Los Angeles has determined that the Project qualifies for a SCEA, based on the following criteria:

1. The Project qualifies as a TPP pursuant to PRC Section 21155(b) because it contains more than 50 percent residential use; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan;

2. The Project is a residential or mixed-use project as defined by PRC Section 21159.28(d);
3. The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the Project area by Connect SoCal 2020 prepared by SCAG;
4. The Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental reports and adopted findings made pursuant to PRC Section 21081, including the Connect SoCal 2020 Program EIR;
5. All potentially significant or significant effects required to be identified and analyzed pursuant to CEQA have been identified and analyzed in an initial study; and
6. With respect to each significant effect on the environment required to be identified in the initial study, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant.

Therefore, the City of Los Angeles finds that the Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.2(b).

## 6. Organization of the SCEA

Based on the information presented above, the SCEA for the Project is organized as follows:

- **Chapter 1. Introduction:** This section provides introductory information about the Project and background information regarding SB 375, lists the TPP criteria, and describes the required content of the SCEA.
- **Chapter 2. Project Description:** This section provides a detailed description of the environmental setting and the Project, including Project characteristics and environmental setting.
- **Chapter 3. SCEA Criteria and TPP Consistency Analysis:** This section includes a discussion of the Project's consistency with the TPP criteria listed above and demonstrates that the Project satisfies all necessary criteria for approval of a SCEA as set forth in California PRC Sections 21155.2, and 21159.28(a).
- **Chapter 4. Connect SoCal 2020 Program EIR Mitigation Measures:** This section identifies all of the mitigation measures contained in the MMRP for SCAG's Connect SoCal 2020 Program EIR and a discussion of the applicability of the mitigation measures to the Project.
- **Chapter 5. Initial Study and Environmental Analysis:** Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of Project-specific and cumulative impacts associated with each subject area. Where the evaluation identifies potentially significant effects, as identified on the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

- **Appendices:** Includes various documents, technical reports, and information used in preparation of the SCEA.

# Chapter 2

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## Project Description

### 1. Introduction

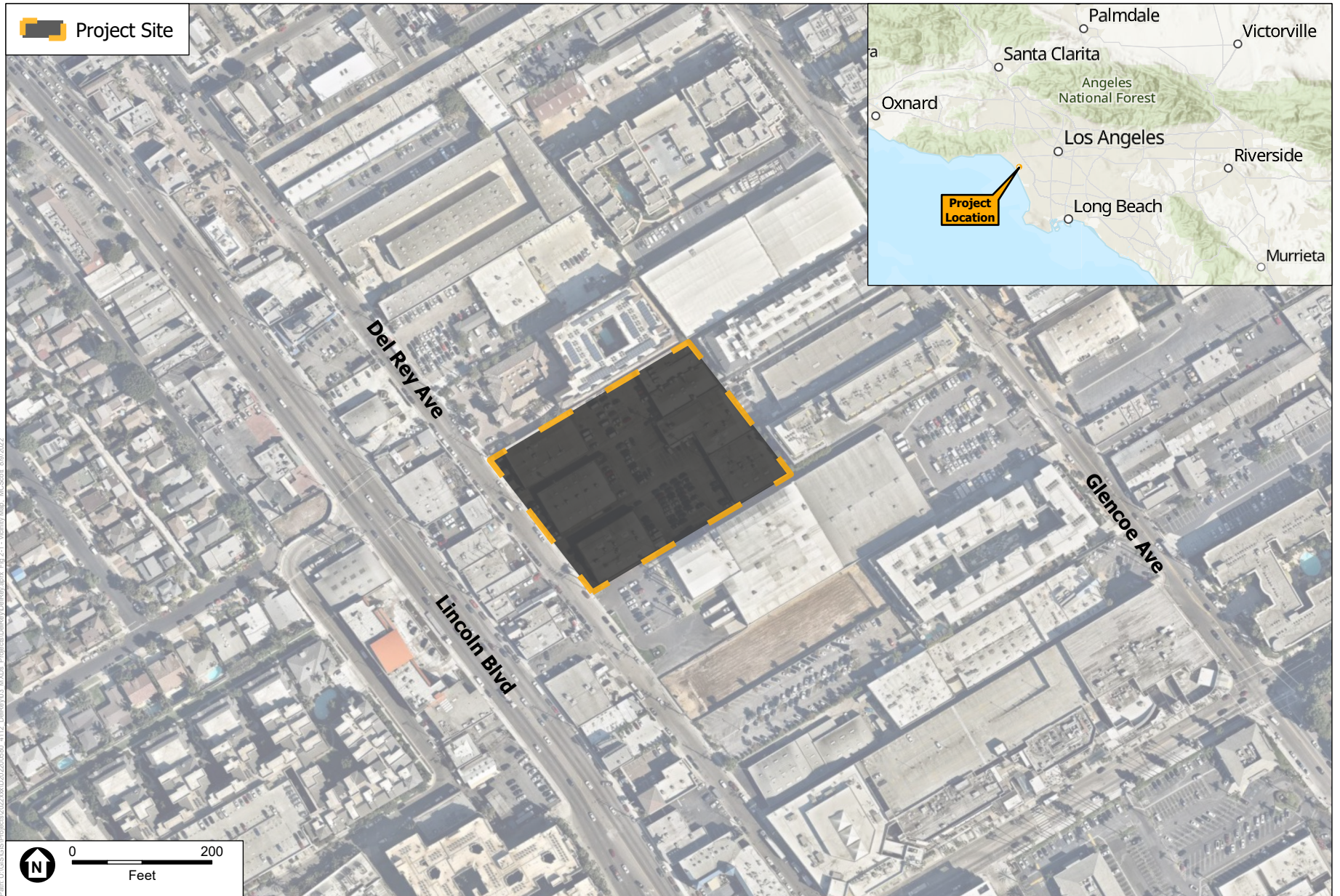
MDR Investors, LLC (the Applicant) proposes the development of a residential building (Project) on an approximately 2.83-acre (123,359 square foot) site (Project Site) located at 4112, 4120, 4130, 4132, 4134, and 4136 Del Rey Avenue in the City of Los Angeles (City). The Project Site is currently improved with creative office and warehouse uses and associated surface parking. The Project would develop a new, six-story (66-foot-tall) mid-rise building consisting of 210 residential units and 33,793 square feet of open space. Of these units, 18 units (11 percent of the Project Site's base density) would be designated as Very Low Income (VLI) units. The Project would also include a five-story parking structure containing a total of 282 parking spaces that would be wrapped by the residential building. The Project would include 253,974 square feet of floor area resulting in a floor area ratio (FAR) of 2.06:1.

### 2. Project Location and Surrounding Uses

The Project Site consists of three Assessor Parcel Numbers (APN): 4230-005-005, -047, and -048. The Project Site is bound by a multi-family apartment building to the north, commercial uses to the east, a FedEx Ship Center to the south, and Del Rey Avenue to the west. The Project Site is located within the Palms – Mar Vista – Del Rey Community Plan (Community Plan) area in the City of Los Angeles.

Local access to the Project Site is provided via Del Rey Avenue. Regional access to the Project Site is provided by State Route 1 (SR-1), which is also referred to as Lincoln Boulevard, that runs north-south and is located approximately 184 feet west of the Project Site; SR-187, which is also referred to as Venice Boulevard, that runs east-west and is located approximately 0.6 mile north of the Project Site; and SR-90 (Marina Freeway), which runs east-west and is located approximately 0.2 mile south of the Project Site. The general vicinity and relationship of the Project Site to surrounding streets is illustrated in **Figure 2-1, Regional and Project Vicinity Map**. As shown in **Figure 2-2, Aerial View of the Project Site**, the Project Site is located in an urbanized area and is surrounded by commercial, residential, and industrial uses.



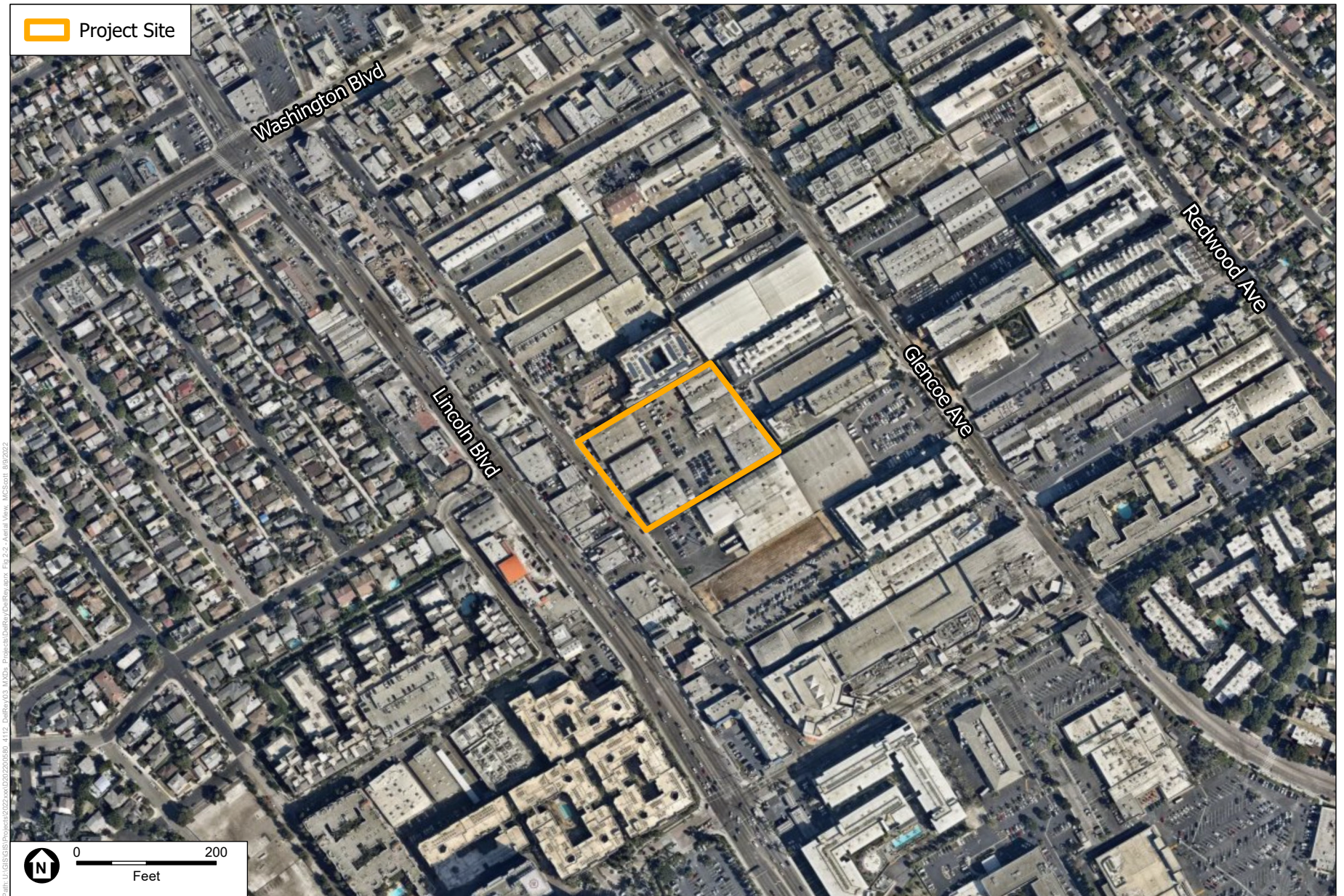


SOURCE: ESA, 2021

4112 Del Rey Avenue

**Figure 2-1**  
Regional and  
Project Vicinity Map





SOURCE: ESA, 2021

4112 Del Rey Avenue

**Figure 2-2**  
Aerial View of the Project Site



The Project Site is zoned CM(GM)-2D-CA (Commercial Manufacturing within the Glencoe/Maxella Specific Plan Zone, Height District 2 with Development Limitation, Commercial and Artcraft District) and is designated for Light Manufacturing uses by the Community Plan. Uses immediately to the north, east, and south are also zoned CM(GM)-2D-CA, and uses immediately to the west across Del Rey Avenue are zoned [Q]M1-1-CDO (Qualified Classification of Limited Industrial Zone, Height District 1, Community Design Overlay District).

Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. The Project Site is designated as a Transit Priority Area (TPA) and is also within the Los Angeles Coastal Transportation Corridor.<sup>1,2,3</sup> The Project is also located within a High Quality Transit Area (HQTA), due to its location within one-half mile of a major transit stop or high quality transit corridor (HQTC).

### 3. Existing Conditions

The Project Site is currently occupied by six one-story buildings and associated surface parking. The northernmost parcel on the Project Site is currently developed with two approximately 11,000 square foot buildings, the middle parcel is currently developed with a 10,480 square foot building and a 12,300 square foot building, and the southernmost parcel is currently developed with a 10,200 square foot and a 9,900 square foot building. The existing buildings are currently occupied with creative office and warehouse uses. No existing trees are located on the Project Site. Vehicle access to the existing surface parking lots is provided via multiple ingress and egress points along Del Rey Avenue.

### 4. Description of the Project

#### a) Development Program

The Project would construct a residential development with common and private open space as well as associated parking spaces. As detailed in **Table 2-1, Proposed Development**, the Project would develop a total of 210 residential units, and 33,793 square feet of open space, including a co-working space and an outdoor courtyard on Level 1, a roof deck, sky lounge, and fitness center on Level 6, and private balconies on Levels 2 through 6. The proposed building includes a wrap-style, 5-story-parking structure that is surrounded by the residential uses.

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<sup>1</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>2</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>3</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

**TABLE 2-1  
PROPOSED DEVELOPMENT**

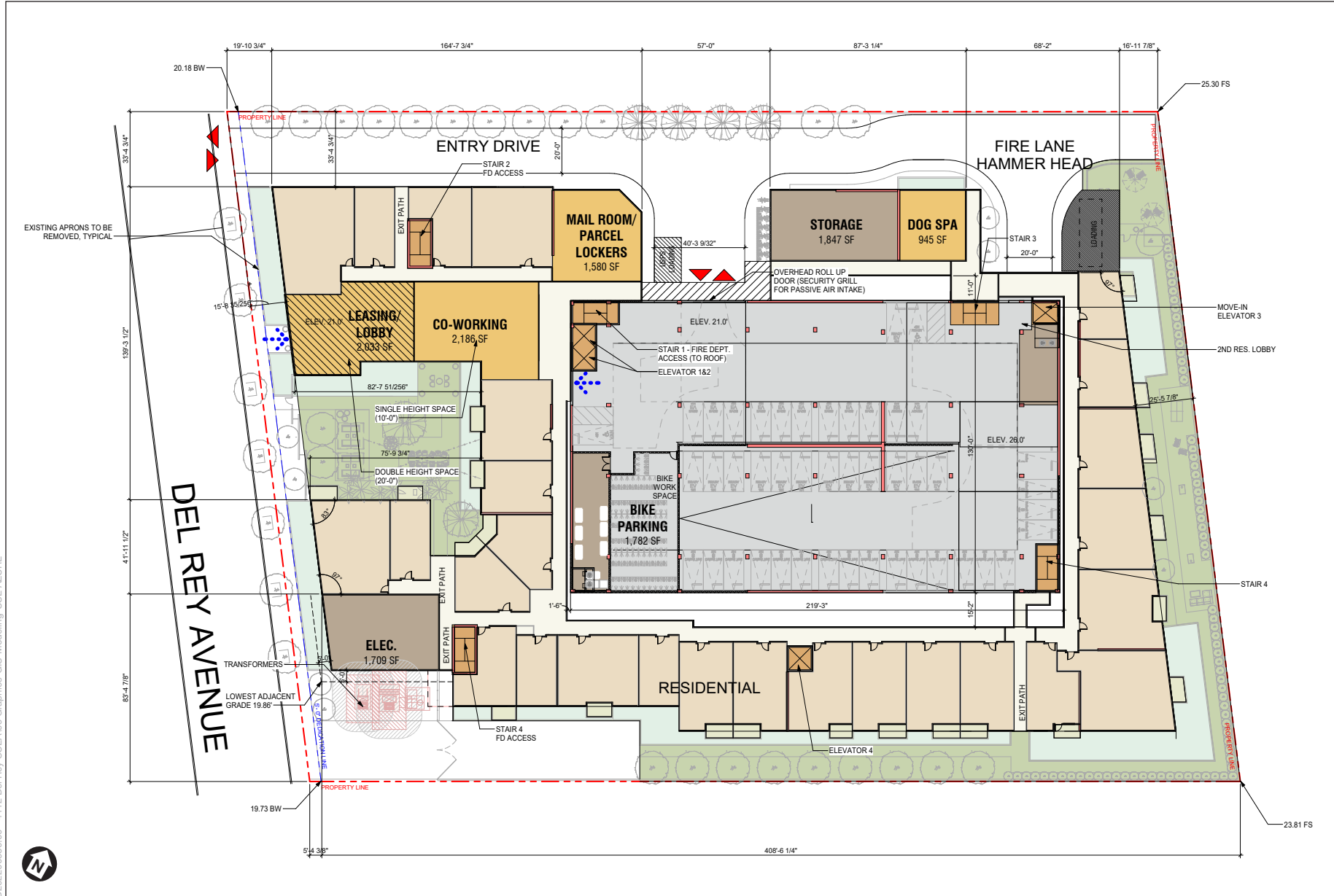
Land Use	Amount Proposed
<b>Residential</b>	
Studio	33 du
1 Bedroom	108 du
2 Bedroom	53 du
3 Bedroom	16 du
<b>Total Residential Units</b>	<b>210 du</b>
<b>Open Space</b>	
Courtyard (Common)	4,890 sf
Sky Deck (Common)	13,447 sf
Indoor Amenities (Common)	6,056 sf
Balconies (Private)	9,400 sf
<b>Total Open Space Provided</b>	<b>33,793 sf</b>
<b>TOTAL PROJECT FLOOR AREA<sup>a</sup></b>	<b>253,974 sf (2.06:1 FAR)</b>
<b>Vehicle Parking</b>	
Standard	163
ADA	6
Electric Vehicle (EV)	113
<b>Total Vehicle Parking Spaces</b>	<b>282</b>
<b>Bicycle Parking</b>	
Short-Term	14
Long-Term	128
<b>Total Bicycle Parking Spaces</b>	<b>142</b>

du = dwelling unit; sf = square feet

<sup>a</sup> Floor area measured per Los Angeles Municipal Code ("LAMC") Section 12.03 ("The area in square feet confined within the exterior walls of a Building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas.")

SOURCE: TCA Architects, 2022.

**Figure 2-3, Conceptual Site Plan**, illustrates the proposed layout of the Project Site. **Figure 2-4, Conceptual Site Plan – Typical Floor Plan**, illustrates the typical floor plan for Levels 2 through 5. **Figure 2-5, Conceptual Site Plan – Level 6**, illustrates the floor plan for Level 6. **Figure 2-6, Roof Plan**, depicts the roof plan for the Project, which would include dedicated areas for future solar panels. **Figure 2-7, Northern and Southern Project Elevations**, provides the north and south elevations and **Figure 2-8, Eastern and Western Project Elevations**, provides the east and west elevations.

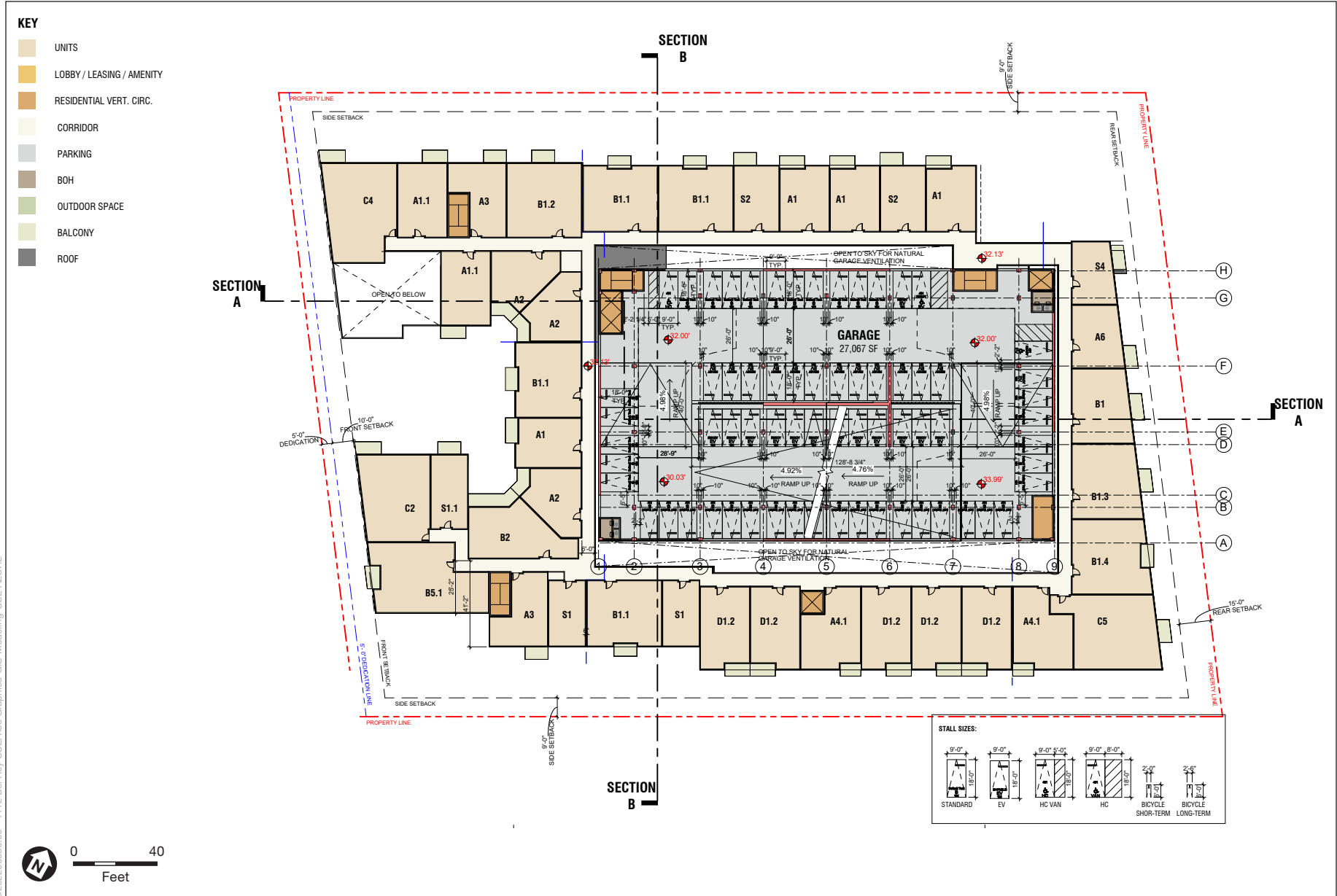


D:\2022\00580.00 - 4112 Del Rey SCEA\05 Graphics-GIS-Modeling-USE AZURE

SOURCE: TCA Architects, 2022

4112 Del Rey Avenue

**Figure 2-3**  
Conceptual Site Plan

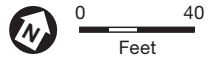
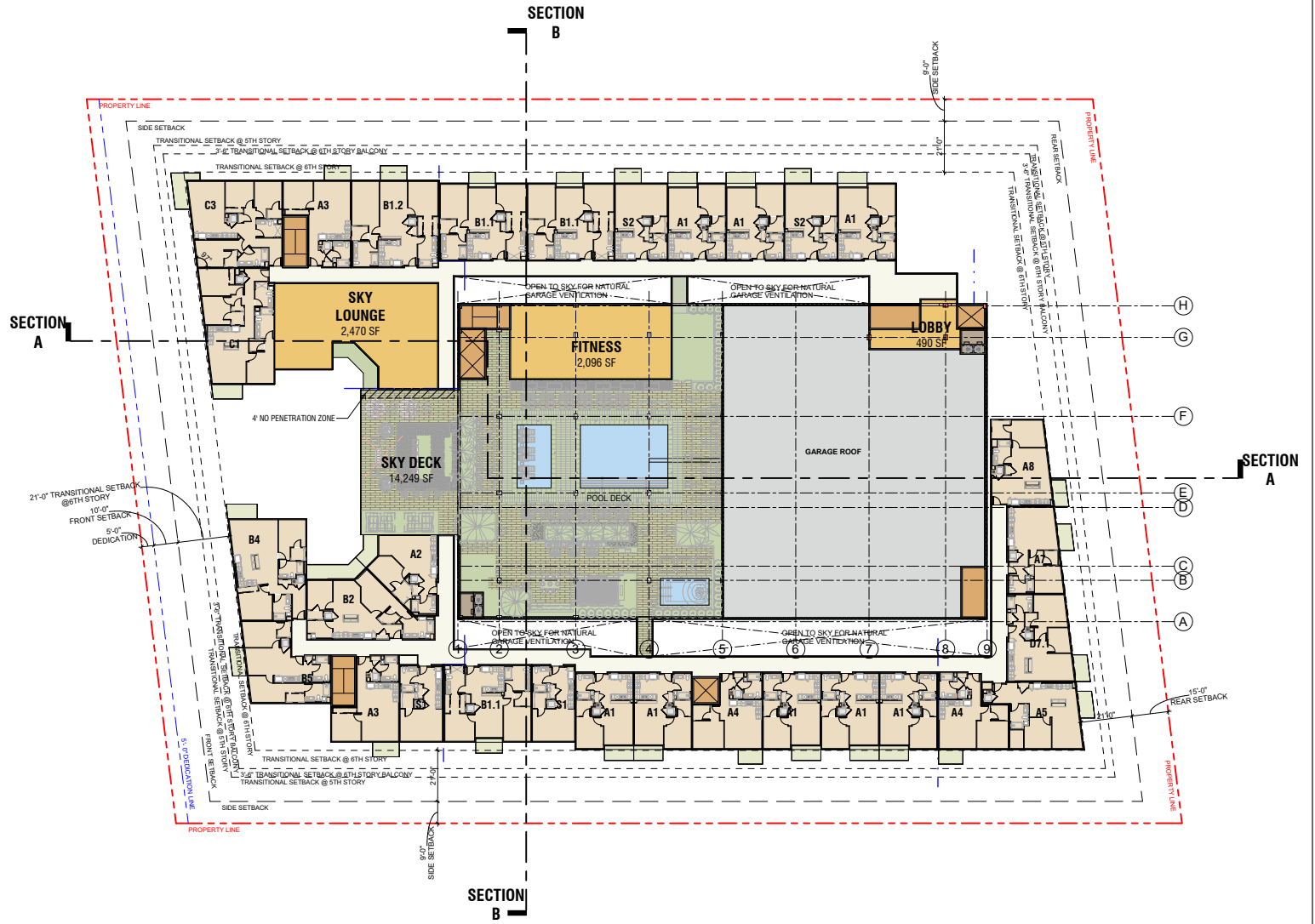


SOURCE: TCA Architects, 2022

4112 Del Rey Avenue

**Figure 2-4**  
Conceptual Site Plan – Typical Floor Plan

- KEY**
- UNITS
  - LOBBY / LEASING / AMENITY
  - RESIDENTIAL VERT. CIRC.
  - CORRIDOR
  - PARKING
  - BOH
  - OUTDOOR SPACE
  - BALCONY
  - ROOF



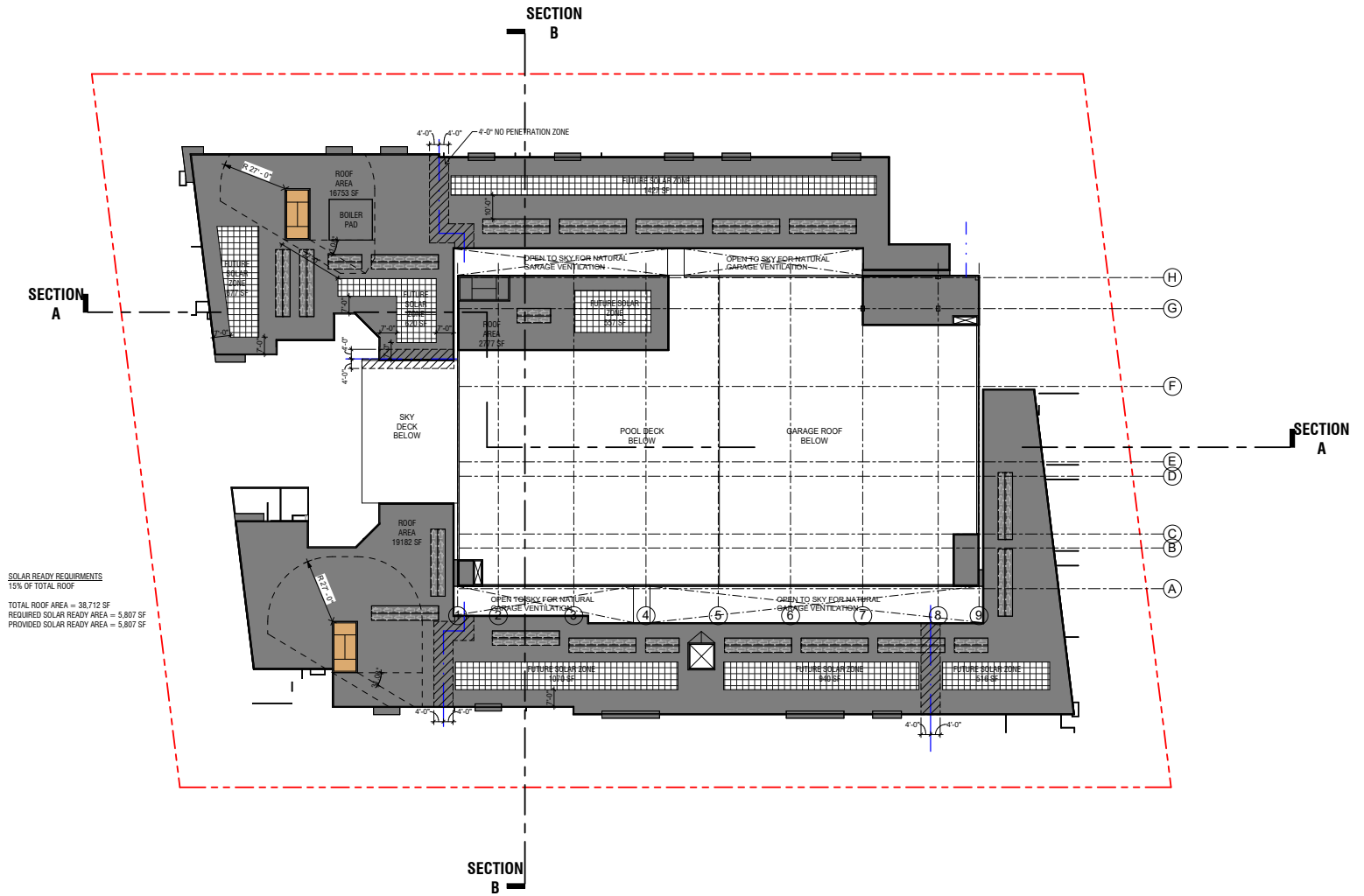
SOURCE: TCA Architects, 2022

4112 Del Rey Avenue

**Figure 2-5**  
Conceptual Site Plan – Level 6

**KEY**

- UNITS
- LOBBY / LEASING / AMENITY
- RESIDENTIAL VERT. CIRC.
- CORRIDOR
- PARKING
- BOH
- OUTDOOR SPACE
- BALCONY
- ROOF



**SOLAR READY REQUIREMENTS**  
 15% OF TOTAL ROOF  
 TOTAL ROOF AREA = 38,712 SF  
 REQUIRED SOLAR READY AREA = 5,807 SF  
 PROVIDED SOLAR READY AREA = 5,807 SF



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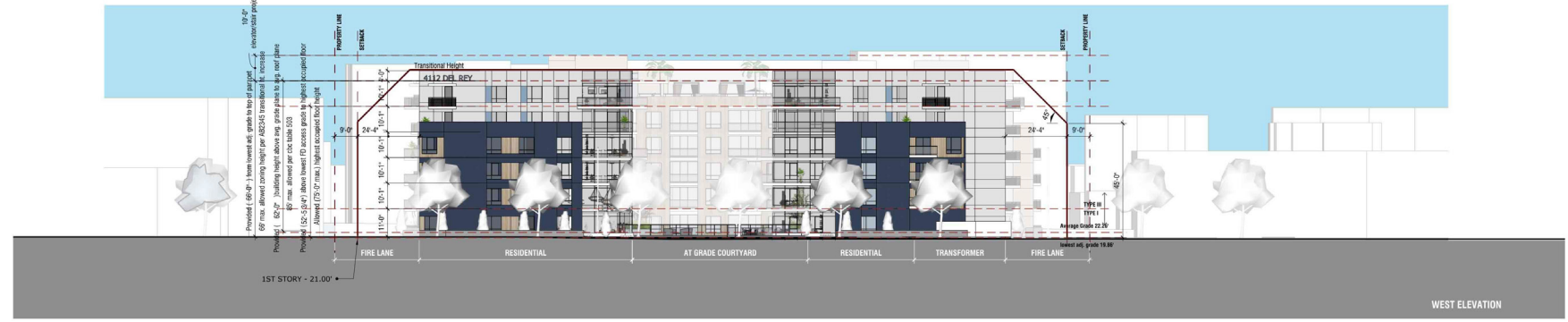
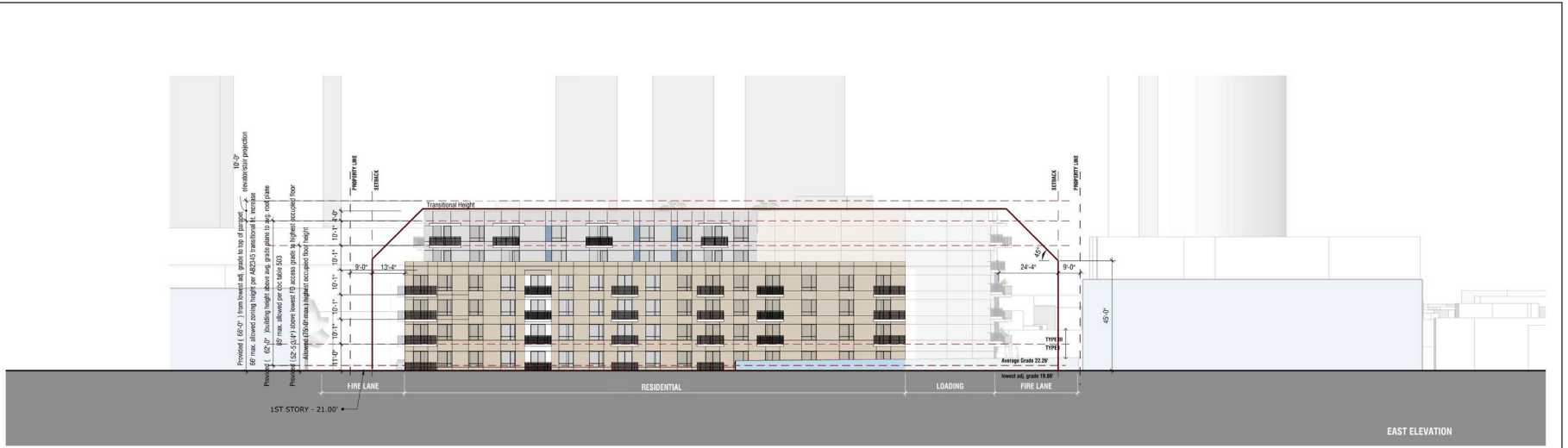
SOURCE: TCA Architects, 2022

4112 Del Rey Avenue

**Figure 2-6**  
 Roof Plan







NOTE: INDICATIVE ELEVATIONS FOR PZA SUBMITTAL PURPOSE ONLY. EXTERIOR ARCHITECTURAL/FACADE ELEMENTS WILL BE DETERMINED AT A FUTURE DATE.



SOURCE: TCA Architects, 2022

4112 Del Rey Avenue

**Figure 2-8**  
Eastern and Western Project Elevations

The residential building would be six stories and approximately 66 feet high. In total, the Project would provide 210 residential units consisting of 33 studio units, 108 one-bedroom units, 53 two-bedroom units, and 16 three-bedroom units. Of these units, 18 units (11 percent of the base density) would be designated as Very Low Income (VLI) units.

Level 1 of the residential building would consist of a leasing/lobby area, co-working area, mail room/parcel lockers, dog spa, storage, electrical areas, and residential units. An outdoor courtyard (Level 1 Courtyard) is also provided at the entrance of the building along Del Rey Avenue. The uses provided on Level 1 would surround the ground floor of the 5-story parking structure. Access to the parking structure would be provided from a driveway off Dey Rey Avenue at the northwestern corner of the Project Site. Levels 2 through 5 of the residential building would include residential units. Level 6 of the residential building would include outdoor amenities such as a pool deck with spa area (Level 6 Sky Deck) as well as indoor amenities including a sky lounge with associated lobby area, fitness center, and residential units.

## **b) Architectural Design**

The proposed 6-story residential building would be built in a contemporary California Coastal modern style. Building materials would include plaster, fiber cement, wood, glass, metal, and low emission glazing. The building massing provides open space surrounding all the residential units to allow for the entry of light and air. Residential units with balconies will be provided off the central courtyard at grade adjacent to the main core of amenities. An amenity and pool deck space will be provided for residents and will provide views of the neighborhood.

## **c) Open Space, Landscaping, and Amenities**

The Project includes the development of common and private open space areas throughout the Project Site. Level 1 of the Project Site would include a fenced courtyard for Project residents located along the western frontage of the Project Site. The courtyard would include amenities such as a communal work table, work pods, a firepit, and seating. The eastern boundary of the Project Site would include a paseo walkway leading to a game lawn with synthetic turf, seating, and outdoor games and a dog park with synthetic turf and low fencing. These outdoor amenities would be for residents of the Project. Level 6 of the residential building would include a pool deck and spa area, sky lounge, gym/fitness center, outdoor kitchen/dining areas, firepits, and outdoor seating and cabanas for the Project's residents. In total, 18,337 square feet of outdoor common open space would be provided, which would exceed the LAMC's outdoor common open space requirement of 12,113 square feet. In addition, an additional 6,056 square feet of indoor common open space would be provided, as well as approximately 9,400 square feet of private open space in the form of balconies would be provided. Furthermore, 4,584 square feet of the noted outdoor common open space would be landscaped, meeting the LAMC's landscape requirement.

A total of 53 trees would be required and provided on the Project Site, meeting the code-required number of trees. 48 trees, as well as 6,512 square feet of permavoid planters, would be included on Level 1 along the Project boundary and five trees would be included within the Level 6 Sky Deck.

**Figure 2-9**, *Level 1 Landscape Plan*, and **Figure 2-10**, *Level 6 Landscape Plan*, illustrates the landscaping and outdoor amenities provided by the Project.

#### **d) Parking and Circulation**

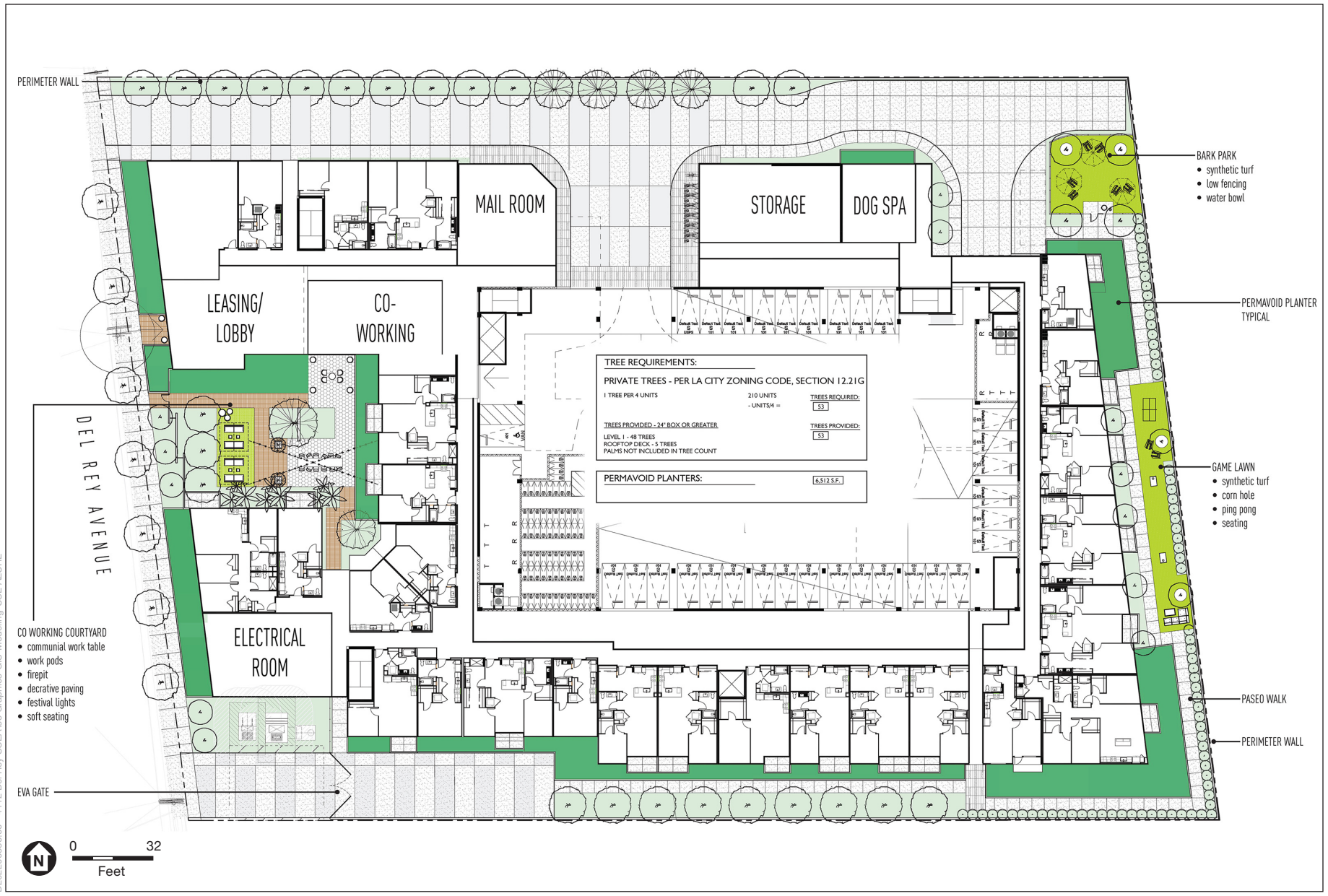
A total of 282 vehicular parking spaces would be provided within five above-grade parking levels. As described above, access to the parking structure would be provided from a driveway off Dey Rey Avenue at the northwestern corner of the Project Site and would provide vehicular ingress and egress to the five above-ground parking levels. The parking structure would be wrapped by the residential uses. A loading area adjacent to the northeast corner of the Project Site would be provided for resident move-in and move-out. A mail loading area would be provided within the entry to the parking structure, adjacent to the mail room/parcel lockers.

The Project would also provide a total of 142 bicycle parking spaces (14 short-term and 128 long-term spaces) with the parking structure. Specifically, the 14 short-term spaces would be located within the entry to the parking structure, and the 128 long-term spaces would be located in the southwestern corner of the parking structure. Refer to Figure 2-3 for further details.

Local pedestrian access to the Project Site would be provided via sidewalks along the west frontage of the Project Site. The leasing/lobby area of the residential building would be accessed on Del Rey Avenue.

#### **e) Lighting and Signage**

Exterior lighting fixtures would be wall- or ground-mounted and would not exceed past the roofline to limit electric lighting within the Project Site. All lighting fixtures for parking areas shall be shielded and positioned such that the artificial lighting is contained within the Project Site. All other exterior lighting on the façade and within the outdoor open spaces would also be directed and shielded to avoid any light spillover onto adjacent properties, including the multi-family apartment building to the north. In addition to Title 24 required exterior lighting controls (like photocells and occupancy/vacancy sensors), exterior lighting would be controlled with astronomical timeclocks to shut off unnecessary lighting zones during nighttime hours. All lighting would be designed and located to be compatible with the architecture and landscaping of the Project. New signage would be used for building identification, security, and wayfinding. In general, signage would be architecturally integrated into the design of the building and would establish appropriate identification for the residential uses. Overall, lighting and signage would be developed in compliance with applicable LAMC requirements.



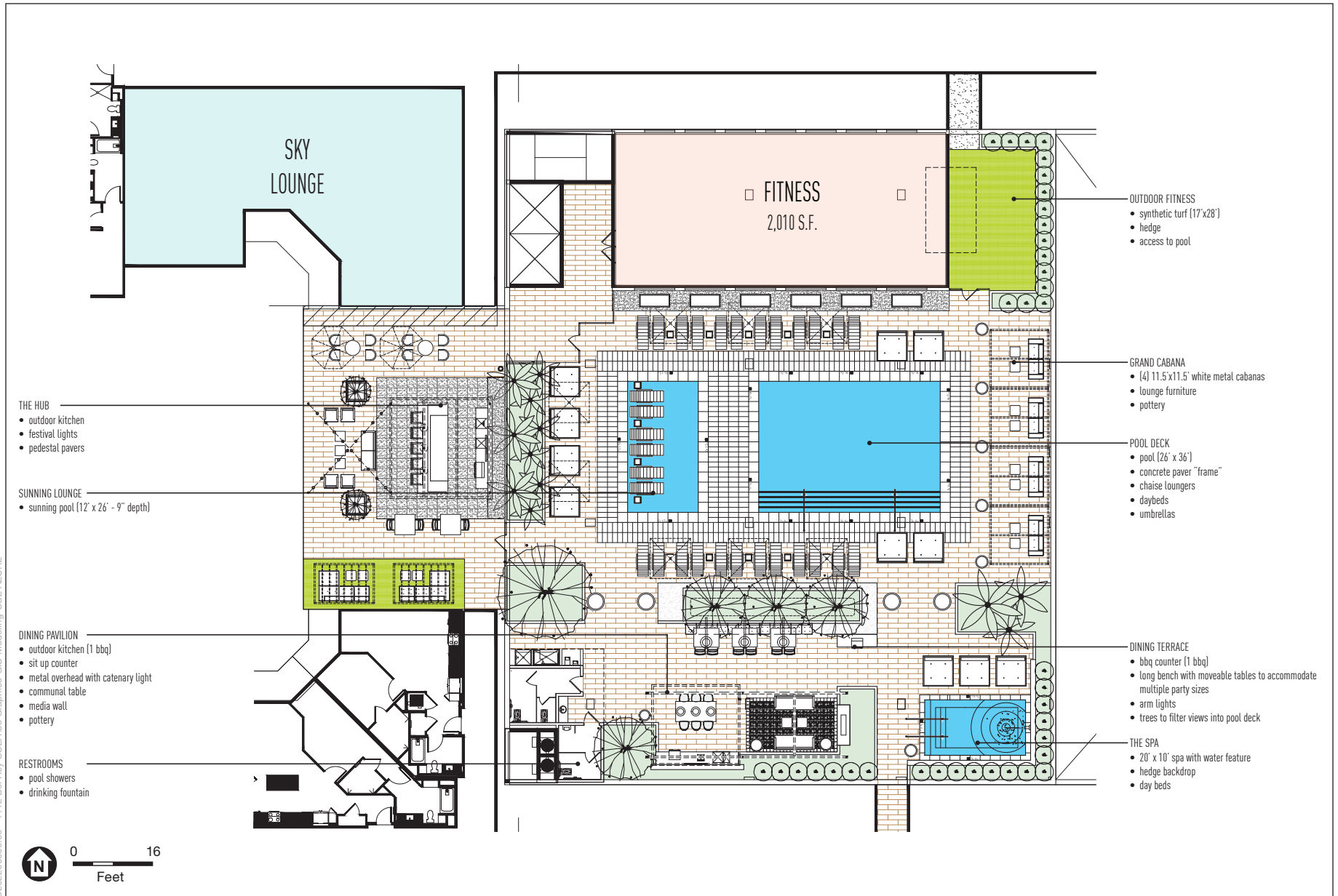
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SOURCE: MJS Landscape Architecture, 2022

4112 Del Rey Avenue

**Figure 2-9**  
Level 1 Landscape Plan





SOURCE: MJS Landscape Architecture, 2022

4112 Del Rey Avenue

**Figure 2-10**  
Level 6 Landscape Plan

## **f) Site Security**

The Project would incorporate a 24-hour/seven-day video surveillance security program to ensure the safety of its residents and visitors. The cameras would be located to capture views at the perimeter of the proposed building; at main pedestrian and vehicular entries; at courtyard and other outdoor locations; and at stair/elevator lobbies. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The Project design would include lighting of entryways and public areas for site security purposes.

## **g) Sustainability Features**

Energy saving and sustainable design features would be incorporated into the Project as the proposed buildings would comply with the applicable Title 24 California Code of Regulations energy efficiency requirements. Design features would include energy conservation, water conservation, and pedestrian- and bicycle-friendly site design. As it relates to energy conservation, the Project would include LED lighting throughout the Project Site and would install ENERGY STAR-rated appliances. The Project would also provide approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements. All glass used in the building design would have minimal reflectivity to reduce glare to surrounding neighbors. As it relates to water conservation, the Project would incorporate efficient water management through low flow faucets and drought resistant landscaping. The Project would also include a pedestrian friendly design with the proposed Level 1 Courtyard that would serve to activate Del Rey Avenue. In addition, as discussed above, bicycle parking spaces would be provided on the Project Site, including short-term and long-term parking provided within the parking structure. Furthermore, the Project would provide 115 EV stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 California Green Building Standards Code.

## **h) Construction Schedule**

Construction of the Project would commence as early as September 2024. Construction would be completed as early as August 2026. Construction of the Project would require excavation to a maximum depth of 7 feet below grade for the footings and foundations. Earthwork would require approximately 30,695 cubic yards (cy) of soil export and 19,671 cy of soil import. Construction staging would be entirely internal to the Project Site. Construction hours would occur in accordance with LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday or holidays. The Project Site would be fenced during construction for security purposes with gate-controlled access. Construction haul trucks would exit the Project Site to SR-90 via Del Rey Avenue, to Maxella Avenue, and then to Lincoln Boulevard.

## 5. Anticipated Project Approvals

It is anticipated that the discretionary approvals required for the Project would include, but may not be limited to, the following:

- Density Bonus Compliance Review pursuant to LAMC Section 12.22 A.25 and California Government Code Section 65915, including a density bonus of 35 percent, reduced parking requirements, and two on-menu incentives/concessions to allow a 35 percent increase in FAR and a one-story/11-foot building height increase;
- Site Plan Review pursuant to LAMC Section 16.05 in connection with the proposed development of 50 or more new residential dwelling units;
- Adoption of the Sustainable Communities Environmental Assessment (SCEA); and
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

## 6. Related Projects

In this SCEA, cumulative impact analyses are provided for each environmental issue discussed in Section 5 (Initial Study and Environmental Analysis) and can be found in each respective subsection of Section 5.

**Table 2-2, *Related Projects List***, lists 11 reasonably foreseeable related projects within a 0.5-mile radius of the Project Site that were considered in the cumulative impact analyses. The locations are shown in the Transportation Assessment.<sup>4</sup> The list of Related Projects is based on information provided by Department of City Planning and Los Angeles Department of Transportation (LADOT) on June 14, 2022, as well as on recent studies of development projects in the Project Site area.

<sup>4</sup> Figure 9, *Transportation Assessment*, Gibson Transportation Consulting, Inc., October 2022.



**TABLE 2-2  
RELATED PROJECTS LIST**

No.	Name	Address	Description
1 <sup>a</sup>	G8	4040 Del Rey Avenue	168 apartment units, 100,000 sf mini-warehouse or 33,000 sf office
2	Mixed-Use	4065 Glencoe Avenue	35,206 sf creative office, 1,500 sf retail, 49 apartment units
3	Mixed-Use	13400 Maxella Avenue	425 apartment units, 90,000 sf retail
4	Thatcher Yard Residential	3233 Thatcher Avenue	98 apartment units
5	New 3-Story Manufacturing & Retail	595 East Venice Boulevard	25,150 sf manufacturing, 5,028 sf retail
6	Change of Use: Warehouse to Office	4721 South Alla Road	31,977 sf office
7	Mixed-Use: Residential & Commercial	2454 South Lincoln Boulevard	77 apartment units, 4,040 sf restaurant, 1,905 sf retail
8	Apartments	1015 East Venice Boulevard	56 apartment units
9	Change of Use: Office to Medical Office	13160 West Mindanao Way	40,000 sf medical office within existing building
10	Office & Retail	4204 South Glencoe Avenue	121,822 sf office, 1,500 sf retail
11	Cedars-Sinai	4640-4660 Lincoln Boulevard	96 hospital beds with capacity to expand to 160 hospital beds

## NOTES:

<sup>a</sup> Although construction of the related project may be partially complete/entirely complete, the project was not fully occupied at the time when traffic counts were conducted or when the SCEA analysis commenced. Therefore, the related project was considered and listed to provide a more conservative analysis..

SOURCE: *Transportation Assessment*, Gibson Transportation Consulting, Inc., October 2022.

## 7. Project Design Features (PDF)

The following Project Design Features (PDFs) are included as part of the Project:

**PDF AIR-1:** Construction equipment operating at the Project Site shall be subject to the requirements listed below. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

- Prior to the issuance of a grading or building permit for each phase, an inventory of off-road heavy-duty construction equipment for that phase of construction, equal to or greater than 50 horsepower that will be used an aggregate of 40 or more hours, shall be provided to the Department of

Building and Safety and the Department of City Planning. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

- Off-road diesel-powered equipment within the construction inventory shall meet the Tier 4 final off-road emissions standards within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board certified Level 3 Diesel Particulate Filter or equivalent;
- All cranes and welders shall be electric-powered;
- Forklifts shall be natural gas-powered;
- The Project shall utilize low-VOC coatings where commercially available during construction activities to avoid excessive VOC emissions; and
- Trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities.

**PDF GHG-1:** The Project's residential units will not include fireplaces.

**PDF GHG-2:** The Project buildings will not include natural gas infrastructure and will be all electric-powered.

**PDF TRANS-1:** Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to the Department of Transportation for review and approval. The CTMP shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The CTMP, including the Worksite Traffic Control Plan, shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;

- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized offsite staging area;
- Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;
- Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways;
- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets to the extent feasible;
- Contain construction activity within the Project Site boundaries;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.

# Chapter 3

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## SCEA Criteria and TPP Consistency

### Analysis

#### 1. Senate Bill 375

As discussed in Chapter 1, *Introduction*, a Sustainable Communities Environmental Assessment (SCEA) may be prepared for a project that (a) is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy (see California Public Resources Code [PRC] Section 21155(a) and (b) is a “transit priority project” (as defined in California PRC Section 21155(b)). As further described below, the Project meets these criteria and, thus, is eligible for certain California Environmental Quality Act (CEQA) streamlining benefits by way of preparing a SCEA for purposes of clearance under CEQA. Specifically, Section 21155(b) applies to a project that:

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board (CARB) has accepted a metropolitan planning organization’s determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas (GHG) emission reduction targets established by CARB;
2. Is a Transit Priority Project (TPP) in that the project meets the following criteria:
  - a. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
  - b. Provides a minimum net density of at least 20 units per acre; and
  - c. Is located within 0.5 miles of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

**a) Criterion 1: Consistency with the general plan designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy.**

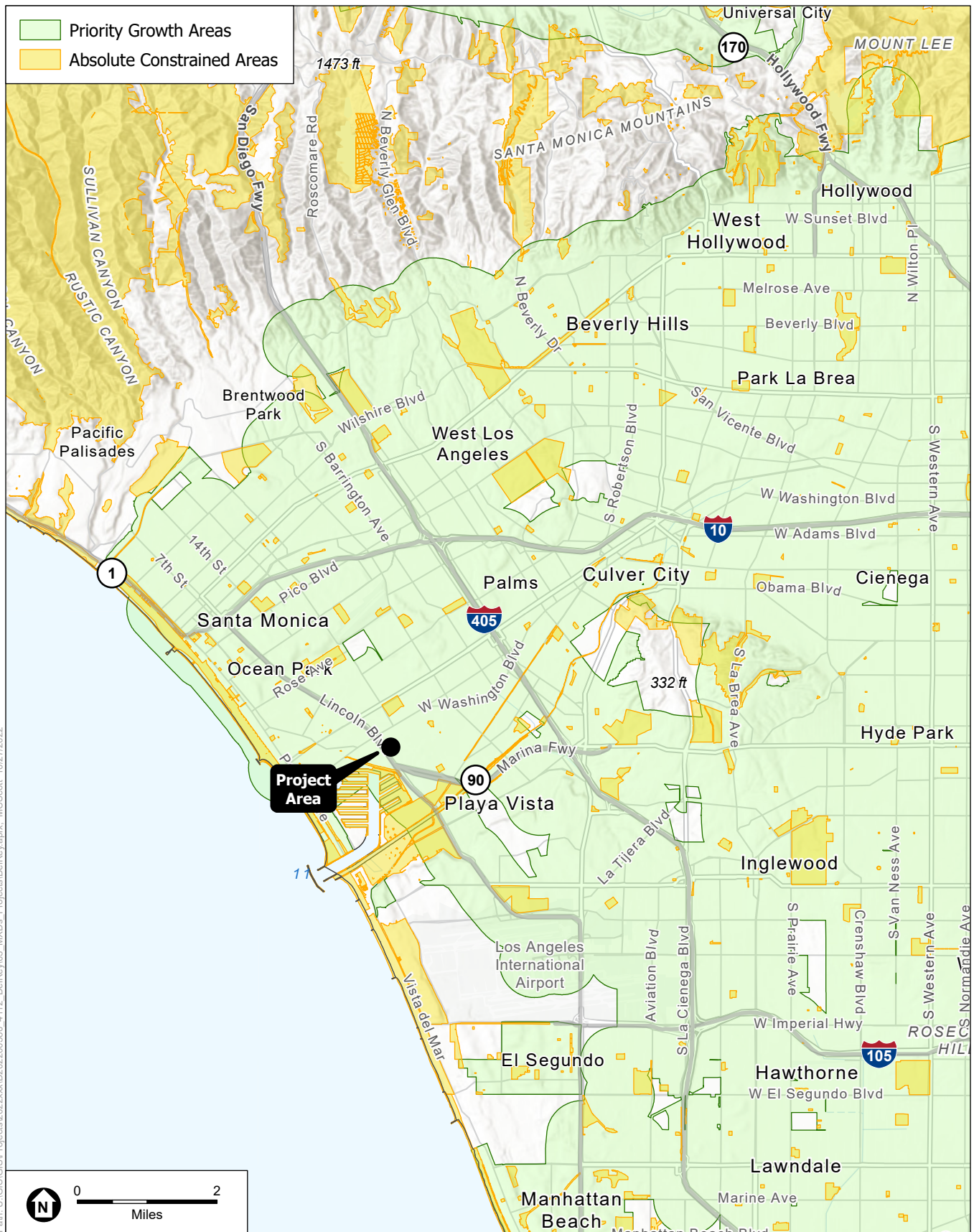
The Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2020) includes strategies for accommodating projected population, household and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increased growth in walkable, mixed-use communities and High Quality Transit Areas (HQTAs). The strategies encourage growth near destinations and mobility options, promote diverse housing choices, leverage technology innovations, support implementation of sustainability policies, and promote a green region. As a Land Use Tool, Connect SoCal 2020 identifies Priority Growth Areas throughout the SCAG region where Connect SoCal 2020 strategies can be fully realized. These Priority Growth Areas include Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These Priority Growth Areas account for only 4 percent of region's total land area, but implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.

- Job Centers: Areas with denser employment than their surroundings. The Connect SoCal 2020 prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.
- TPAs: Areas within one-half mile of a major transit stop that is existing or planned. According to Connect SoCal 2020, focusing regional growth in areas with planned or existing transit stops is key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports strategies outlined in Connect SoCal 2020 for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.
- HQTAs: Areas within one-half mile from major transit stops and high quality transit corridors. New developments should be context-sensitive,

responding to the existing physical conditions of the surrounding area. Sensitively designed Transit Oriented Developments (TODs) can preserve existing development patterns and neighborhood character while providing a balance of housing choices.

- **NMAs:** Areas that focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging “walkability,” active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to “walkable” and destination-rich neighborhoods to more people in the future.
- **Livable Corridors:** Livable Corridor land-use strategies include development of mixed use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a “Complete Streets” approach to roadway improvements and zoning that allows for the replacement of underperforming auto- oriented strip retail between nodes with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.

Connect SoCal 2020 identifies these Priority Growth Areas within Exhibits 3.4 through 3.10. For purposes of this analysis, Figures 3-1 through 3-7, below, identify the location of the Project Site as it relates to these Priority Growth Areas. As shown on the figures, the Project Site is located adjacent to a Job Center and NMA; within the boundaries of a TPA and an HQTAs; and along a Livable Corridor. (The Project Site is not within a Sphere of Influence.) The Project would be consistent with the general use designation, density, and building intensity set forth in Connect SoCal 2020 for each of these Priority Growth Areas in that the Project includes development of 210 multi-family housing units (including 18 affordable units) on an infill site near transit and sources of employment, shopping, and entertainment, leveraging existing density and infrastructure and reducing the length of vehicle trips for residents and employees.

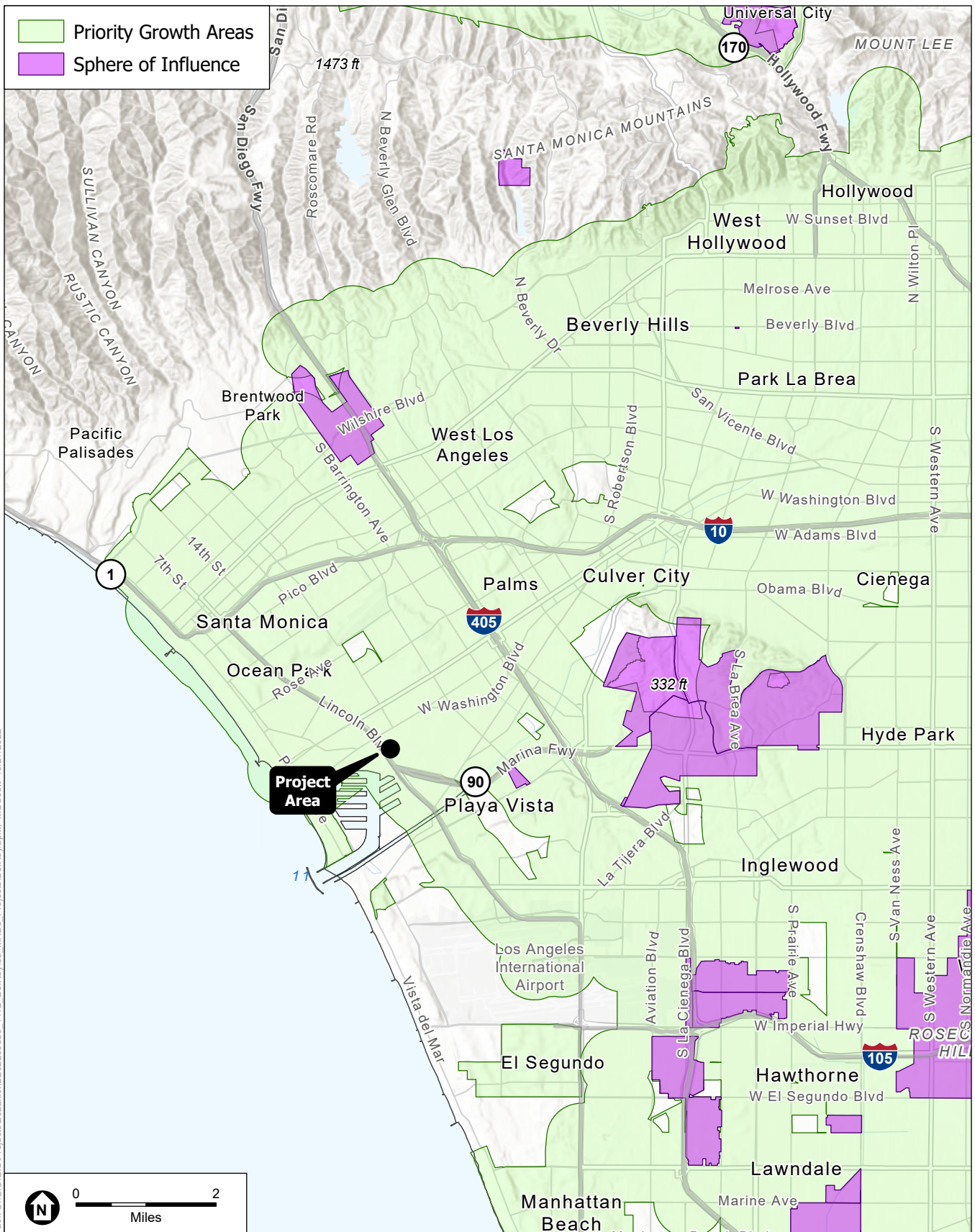


SOURCE: SCAG 2020; ESRI 2022; ESA 2022

4112 Del Rey Avenue

**Figure 3-1**  
 Priority Growth Areas -  
 Growth Constraints



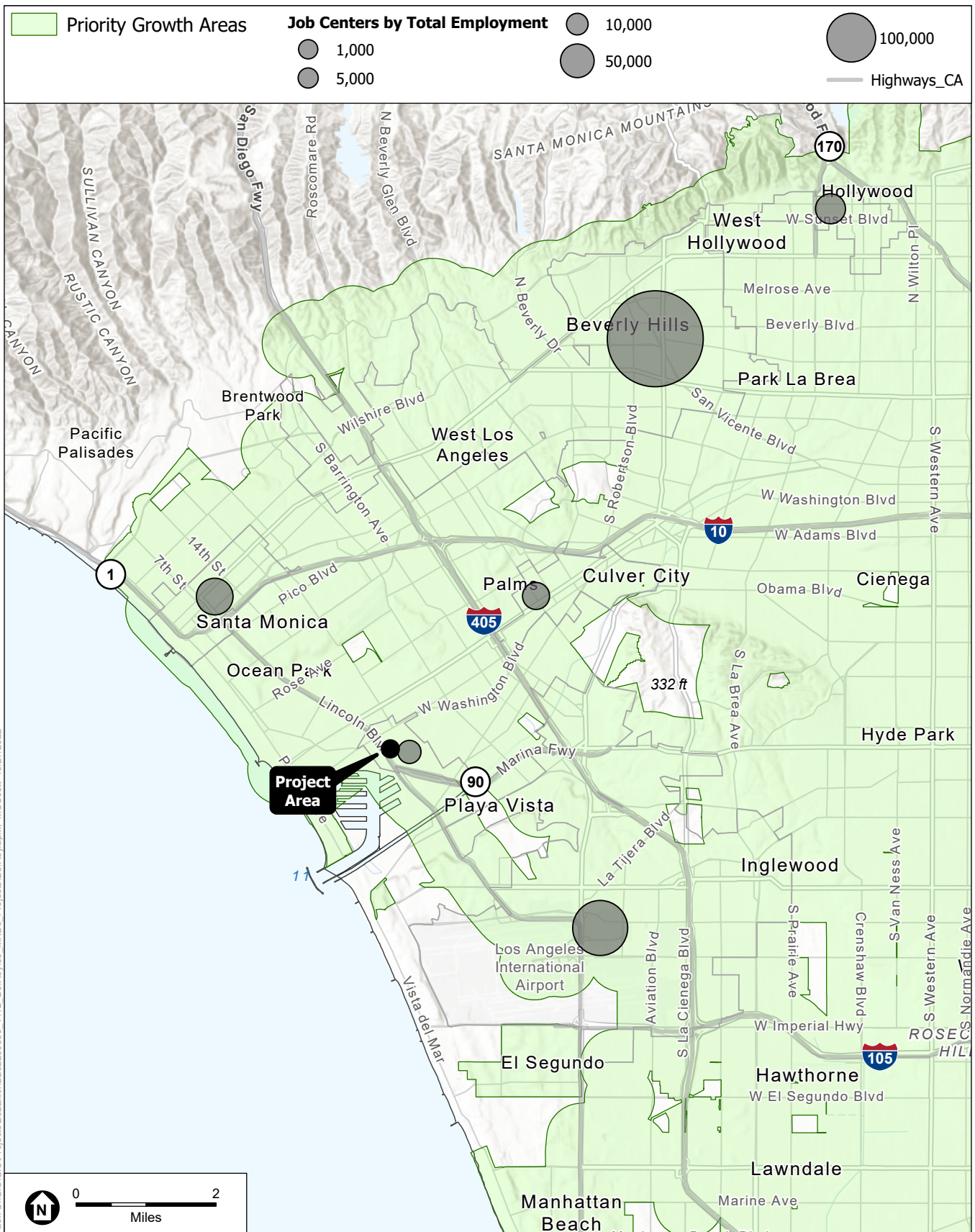


SOURCE: SCAG 2020; ESRI 2022; ESA 2022

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**Figure 3-2**  
 Priority Growth Areas -  
 Spheres of Influence

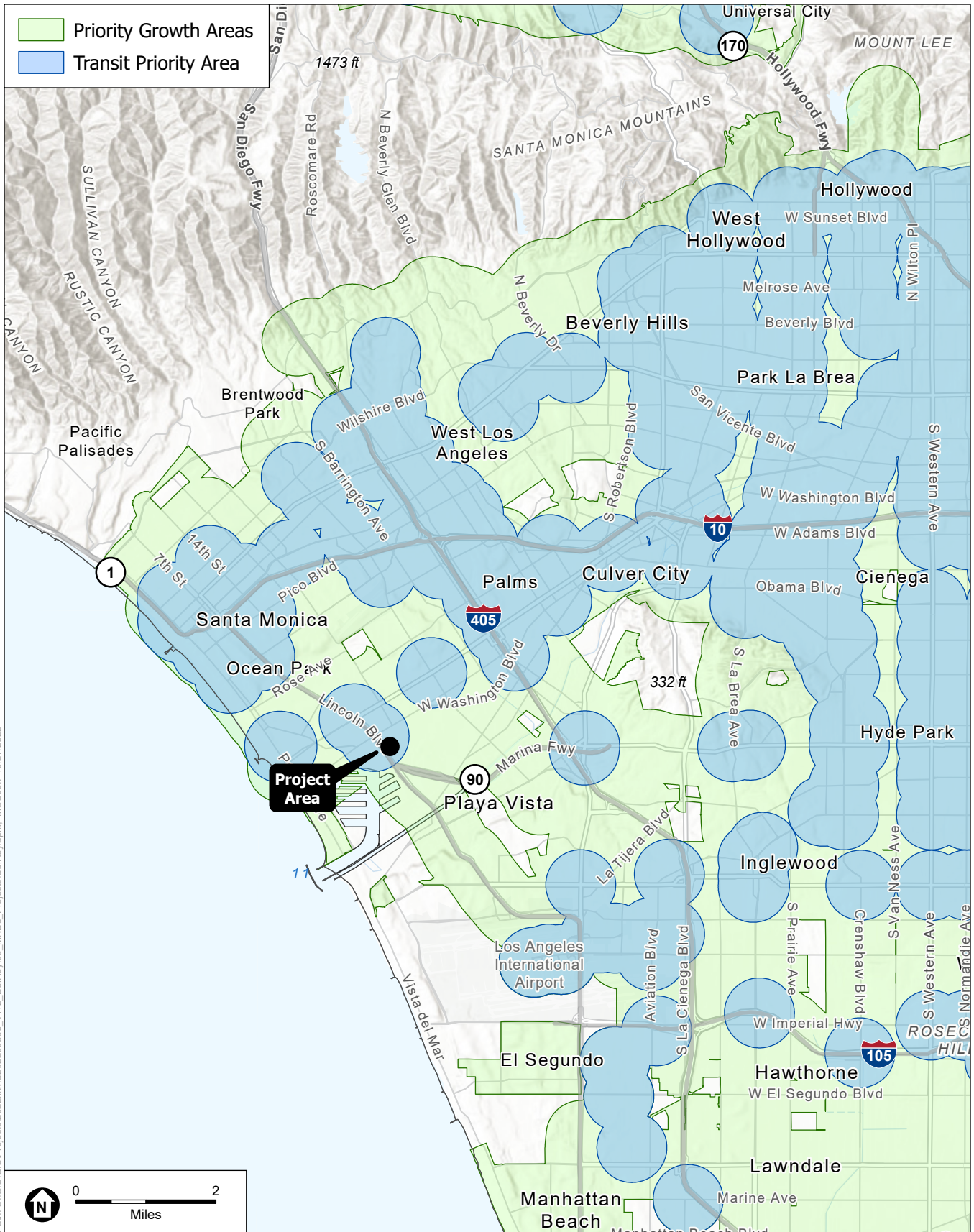




SOURCE: SCAG 2020; ESRI 2022; ESA 2022

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**Figure 3-3**  
Priority Growth Areas -  
Job Centers

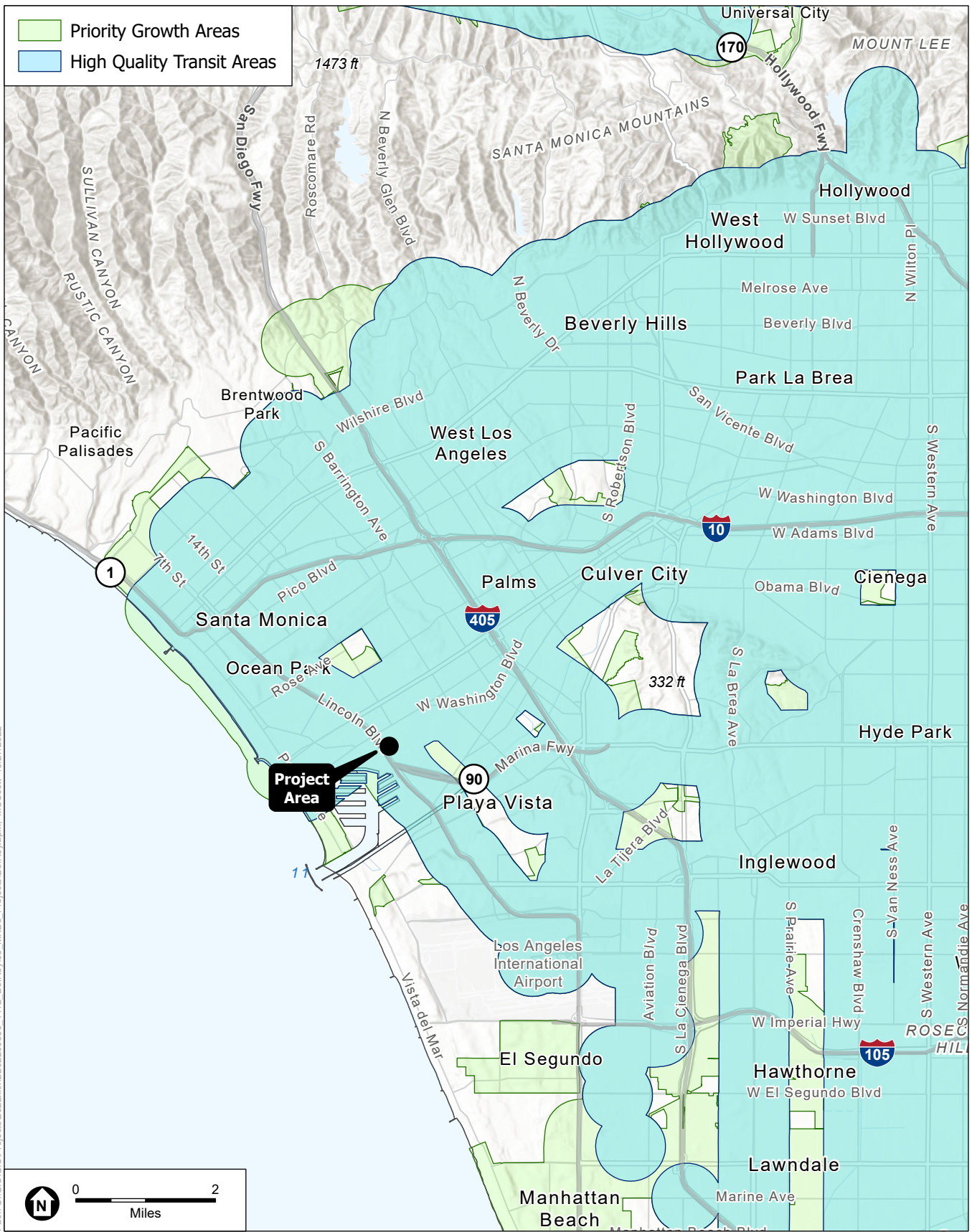


SOURCE: SCAG 2020; ESRI 2022; ESA 2022

4112 Del Rey Avenue

**Figure 3-4**  
 Priority Growth Areas -  
 Transit Priority Areas

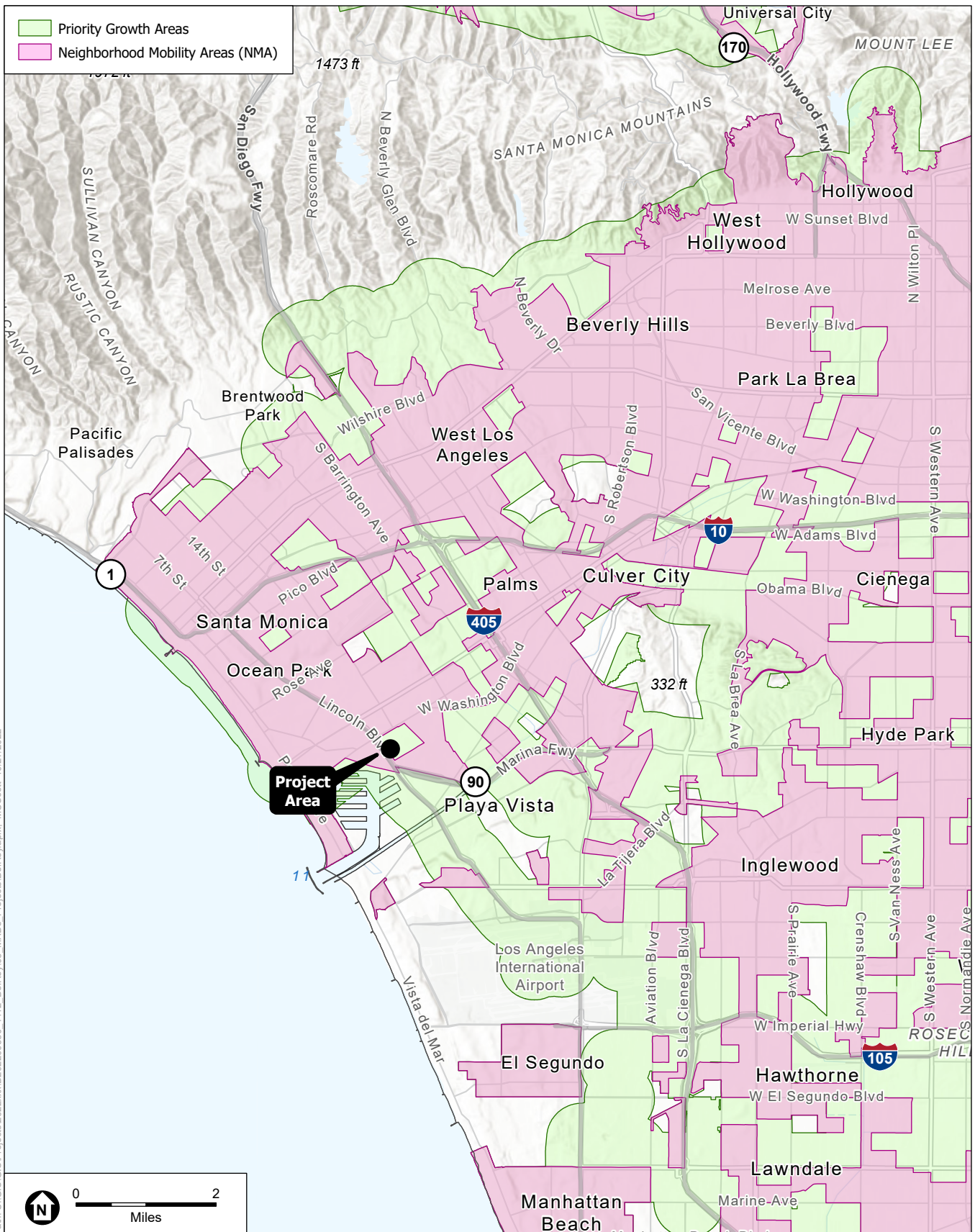




SOURCE: SCAG 2020; ESRI 2022; ESA 2022

4112 Del Rey Avenue

**Figure 3-5**  
 Priority Growth Areas -  
 High Quality Transit Areas (2045)

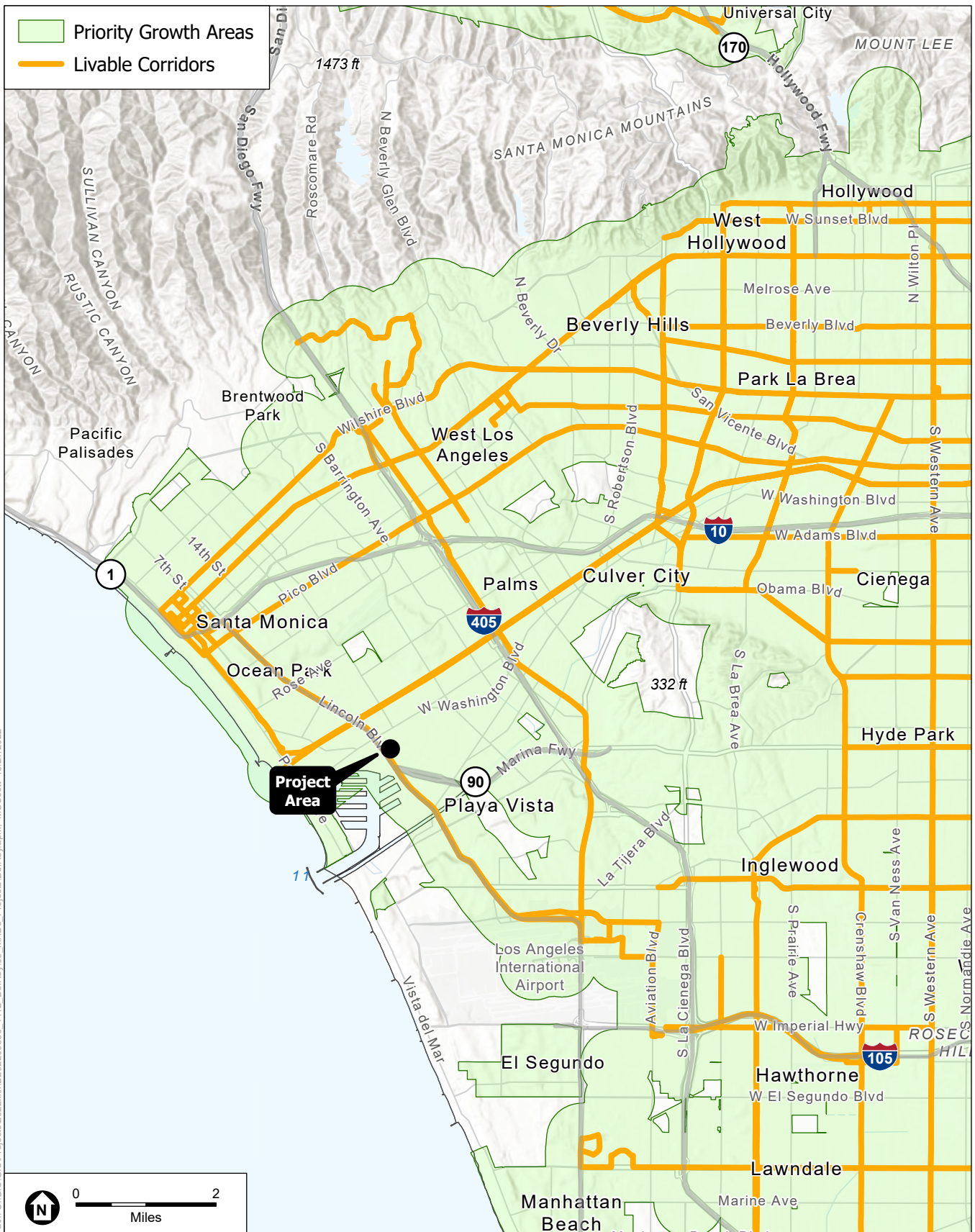


SOURCE: SCAG 2020; ESRI 2022; ESA 2022

4112 Del Rey Avenue

**Figure 3-6**  
 Priority Growth Areas -  
 Neighborhood Mobility Areas





SOURCE: SCAG 2020; ESRI 2022; ESA 2022

4112 Del Rey Avenue

**Figure 3-7**  
Priority Growth Areas -  
Livable Corridors

Consistent with the land use policies for TPAs, the Project would constitute compact, focused infill development in an established community with access to high-quality transportation. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. In addition, the Project Site's location near robust transit opportunities (Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.

Consistent with the land use policies for HQTAs, the Project would also be context-sensitive and respond to the existing physical conditions of the surrounding area. The Project would preserve existing development patterns and neighborhood character while providing additional housing options for future residents and providing employment opportunities.

Consistent with Connect SoCal 2020's general use designation, density, and building intensity for Livable Corridors, the Project would develop new multi-family residential uses in a destination-rich area with robust residential to non-residential land use connections and high roadway intersection densities. The Project would also encourage "walkability" by locating new housing near existing retail, transit, and employment and improving pedestrian sidewalks around the Project Site frontage, allowing better access to the surrounding area. Further, the Project would include 128 long-term bicycle parking stalls and 14 short-term bicycle parking stalls, which would encourage bicycling as a form of exercise and transportation.

This type of transit-oriented residential development helps to reduce dependence on automobile travel and to reduce associated mobile-source GHG emissions. Thus, the Project is consistent with SCAG's land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the land use, density, and intensity of development specified in Connect SoCal 2020 for projects near Job Centers and in TPAs, HQTAs, NMAs, and along Livable Corridors.

(1) The Project is Consistent with Applicable Connect SoCal 2020 Policies Specified for the Project Area.

As discussed below on Table 3-1, the Project would be consistent with applicable goals, policies, and benefits of SCAG's Connect SoCal 2020.

**TABLE 3-1**  
**CONSISTENCY ANALYSIS WITH THE CONNECT SoCAL 2020 GOALS AND GUIDING PRINCIPLES**

<b>Goals and Guiding Principles</b>	<b>Consistency Assessment</b>
<p><b>Goal 1:</b> Encourage regional economic prosperity and global competitiveness.</p>	<p><b>Not Applicable/Consistent.</b> This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing near sources of employment and shopping in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California.</p>
<p><b>Goal 2:</b> Improve mobility, accessibility, reliability, and travel safety for all people and goods</p>	<p><b>Consistent.</b> SB 743 updates the way transportation impacts are evaluated in California for new development projects, with a focus on providing active transportation and reducing VMT. The Project is located in an urbanized area in the city within a HQTAs, as defined by SCAG, and a TPA, as defined by SB 743. The Project would develop residential uses within walking and bicycling distance of several bus lines. There are seven local bus routes, including Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 within 0.5 mile of the Project. The Project would also include 142 bicycle parking spaces. As a result, the Project would provide residents and visitors with convenient access to public transit and opportunities for walking and bicycling. Furthermore, the Project Site is within walking distance of existing office, institutional, recreational, and neighborhood-serving commercial uses. Therefore, the location of the Project encourages mobility and accessibility for residents, employees, and visitors of the Project Site.</p>
<p><b>Goal 3:</b> Enhance the preservation, security, and resilience of the regional transportation system.</p>	<p><b>Not Applicable.</b> This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.</p>
<p><b>Goal 4:</b> Increase person and goods movement and travel choices within the transportation system</p>	<p><b>Consistent.</b> The Project is located in a dense urban area that is well served by transit and would increase intensity on site above what currently exists.</p> <p>Increased density provides a foundation for the implementation of other strategies, such as enhanced transit services, and facilitates the use of transit by more people. The Project would develop residential uses within walking and bicycling distance of several bus lines. There are seven local bus routes, including Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 within 0.5 mile of the Project.</p> <p>The Project would provide a total of 142 bicycle parking spaces, resulting in opportunities for residents and visitors to use public transit, bicycling, and walking to access their jobs or shopping opportunities. Therefore, the Project would encourage the utilization of multi-modal transit to and from the Project Site and would contribute to the increase of person and goods movement and travel choices within the transportation system by providing housing near transit stops. The Project is consistent with this goal.</p>

Goals and Guiding Principles	Consistency Assessment
<p><b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality</p>	<p><b>Consistent.</b> The Project is located in a dense urban area that is well served by transit and would result in a greater intensity on the Project Site compared to existing conditions. The Project would encourage the use of multi-modal transportation options. The Project would facilitate the use of alternative modes of transportation, which would aid in reducing car trips, impacts to air quality, and GHG emissions. The Project would provide 142 bicycle parking spaces in compliance the number of spaces required by the City.</p> <p>The Project would encourage the use of transit, walking, and bicycling as the Project would locate residential development in an area within walking and bicycling distance of existing bus lines as well as provide a total of 282 vehicle parking spaces and 142 bicycle parking spaces.</p> <p>Local pedestrian access to the Project Site and residential building would be acquired via sidewalk along the west frontage of the Project Site on Del Rey Avenue.</p> <p>The Project is located in a dense urban area and would represent a greater intensity than the existing development on the Project Site. The Project would replace six buildings occupied by creative office and warehouse uses and associated surface-level parking, to develop a mid-rise building consisting of 210 residential units and 33,793 square feet of open space on an approximately 123,359-square-foot (2.83-acre) site. Increased density provides a foundation for the implementation of other strategies, such as enhanced transit services, and facilitates the use of transit by additional people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area. As a result, the Project would encourage land use and growth patterns that facilitate transit and active transportation by: creating housing opportunities and choices for people at low-income levels; creating walkable areas; providing infill development within an existing community; providing a variety of transportation choices; and providing opportunities for residents to use public transit for work trips and walk/bike to retail businesses near the Project Site.</p> <p>In addition, the increase in active transportation compared to vehicle use would have air quality and GHG emission benefits.</p> <p>Furthermore, the Project's addition of 53 trees would further reduce the Project's GHG emission contribution and air quality impacts. The Project is consistent with this goal.</p>



Goals and Guiding Principles	Consistency Assessment
<b>Goal 6:</b> Support healthy and equitable communities	<p><b>Consistent.</b> The Project would encourage the use of multi-modal transportation options. The Project would facilitate the use of alternative modes of transportation, which would aid in reducing car trips and reducing impacts to air quality. The Project would encourage the use of transit, walking, and bicycling as the Project would locate residential development in an area within walking and bicycling distance of existing bus lines as well as provide a total of 282 vehicle parking spaces and 142 bicycle parking spaces.</p> <p>Local pedestrian access to the Project Site and residential building would be acquired via sidewalk along the west frontage of the Project Site on Del Rey Avenue.</p> <p>The Project is located in a dense urban area and would be a greater intensity than what currently exists on the Project Site. The Project would replace six buildings occupied by creative office and warehouse uses and associated surface-level parking, to develop a mid-rise building consisting of 210 residential units and 33,793 square feet of open space on an approximately 123,359-square-foot (2.83-acre) site.</p> <p>Combined, the enhanced pedestrian mobility in the Project vicinity would improve the health of the surrounding community. The Project also includes a variety of common open space and private open space (i.e., balconies) for residents, which would encourage recreational activities to support a healthy community. Therefore, the Project is consistent with this goal.</p>
<b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network	<p><b>Consistent.</b> The Project would encourage the use of transit, walking, and bicycling as the Project would locate residential development in an area within walking and bicycling distance of bus lines as well as provide a total of 282 vehicle parking spaces and 142 bicycle parking spaces.</p> <p>Local pedestrian access to the Project Site and residential building would be provided via sidewalk along the west frontage of the Project Site on Del Rey Avenue.</p> <p>The Project also includes a variety of common open space and private open space (i.e., balconies). The proposed open space would enhance the existing streetscape environment, making pedestrian experiences more enjoyable for residents by providing trees and a pedestrian-friendly courtyard. The Project would replace six buildings occupied by creative office and warehouse uses and associated surface-level parking, to develop a mid-rise building consisting of 210 residential units and 33,793 square feet of open space on an approximately 123,359-square-foot (2.83-acre) site, thereby increasing the density on the Project Site as compared to existing conditions. Increased density provides a foundation for the implementation of other strategies, such as enhanced transit services, and facilitates the use of transit by additional people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area.</p> <p>As a result, the Project would encourage land use and growth patterns that support an integrated regional development pattern and transportation network by: creating housing opportunities;</p>

Goals and Guiding Principles	Consistency Assessment
<p><b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.</p>	<p>creating walkable areas; providing infill development within an existing community; providing a variety of transportation choices; and providing opportunities for residents and visitors to use public transit for work trips and walk to retail businesses near the Project Site. This would decrease vehicle trips, VMT, and associated GHG emissions. The Project is consistent with this goal.</p>
<p><b>Goal 9:</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options</p>	<p><b>Not Applicable.</b> This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.</p> <p><b>Consistent.</b> The Project is located in a dense urban area that is well served by transit and would represent a greater intensity than existing development on Project Site. The Project would provide multi-family housing in a variety of configurations and price levels in an existing, transit-accessible area. The Project would provide 33 studio units, 108 one-bedroom units, 53 two-bedroom units, and 16 three-bedroom units. Of the 210 units, 18 units would be reserved as very low-income affordable units. Therefore, the Project would encourage the development of diverse housing for residents of various economic backgrounds.</p> <p>In addition, the provision of various unit sizes, including studio, one-bedroom, two-bedroom, and three-bedroom units, would provide housing for differing family sizes. Increased density provides a foundation for the implementation of other strategies, such as enhanced transit services, and facilitates the use of transit by additional people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area. As a result, the Project would encourage the development of diverse housing in an area that is supported by multiple transportation options by: creating housing opportunities; providing housing near transit; creating walkable areas; providing infill development within an existing community; providing a variety of transportation choices; and providing opportunities for residents and visitors to use public transit for work trips and walk to retail businesses near the Project Site.</p> <p>Furthermore, the Project would provide 142 bicycle parking spaces. Local pedestrian access to the Project Site and residential building would be acquired via sidewalk along the west frontage of the Project Site on Del Rey Avenue.</p> <p>The Project Site is located in transit-rich and pedestrian accessible locations with connectivity to many areas within the city. Transit opportunities in the Project Site include various bus routes operated by the Cities of Santa Monica and Culver City. See consistency analysis for Goal 2, above, for a list of nearby transportation options.</p>

Goals and Guiding Principles	Consistency Assessment
<p><b>Goal 10:</b> Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p><b>Consistent.</b> The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.</p>
<p><b>Guiding Principle 1</b> Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.</p>
<p><b>Guiding Principle 2</b> Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.</p>
<p><b>Guiding Principle 3</b> Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.</p>
<p><b>Guiding Principle 4</b> <b>Encourage RTP/SCS</b> investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.</p>

Goals and Guiding Principles	Consistency Assessment
<p><b>Guiding Principle 5</b> Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.</p>
<p><b>Guiding Principle 6</b> Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG that has the responsibility of monitoring the progress of Connect SoCal 2020.</p>
<p><b>Guiding Principle 7</b> Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.</p>

*Source: Connect SoCal 2020, adopted September 3, 2020.*

**b) Criterion 2(a): Contains at least 50 percent residential use, based on total building square footage and if, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.**

As described in Chapter 2, *Project Description*, the Project would develop a new mid-rise building consisting of 210 residential units and 33,793 square feet of open space and residential amenities, within a building containing 253,974 square feet of floor area, as measured by the LAMC. Therefore, the Project would contain 100 percent residential uses, exceeding the 50 percent threshold. Moreover, the Project would result in a FAR of 2.06:1. As such, the Project is consistent with this criterion.

**c) Criterion 2(b): Provide a minimum net density of at least 20 dwelling units per acre.**

The Project would develop the approximately 123,359 square feet (2.83 acres) Project Site, which is currently improved with six buildings occupied by creative office and

warehouse uses and associated surface-level parking. The Project includes development of 210 dwelling units. As such, the Project would provide approximately 74 dwelling units per acre, which is greater than the required minimum of 20 units per acre. Therefore, the Project is consistent with this criterion.

**d) Criterion 2(c): Is located within one-half mile of a major transit stop or high-quality transit corridor included in Connect SoCal 2020.**

PRC Section 21064.3 defines a major transit stop as a site containing any of the following: (a) An existing rail or bus rapid transit station; (b) A ferry terminal served by either a bus or rail transit service; or (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” A high-quality transit corridor is “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours”.<sup>1</sup> SCAG and the City define peak hours as between 6 A.M. and 9 A.M. and between 3 P.M. and 7 P.M. As described below, the Project Site is located within one-half mile of a high-quality transit corridor.

As described above, SCAG has identified the Project location as being within an HQTAs and TPA based on the Project Site’s proximity to a high-quality transit corridor. An HQTAs is defined as “a walkable transit village or corridor, consistent with the adopted RTP/SCS and is within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours”.<sup>2</sup> Santa Monica Big Blue Bus Route 3, located approximately 720 feet southwest of the Project Site along Lincoln Boulevard, travels in the northbound direction 12 times during the morning peak period (between 6 A.M. and 9 A.M.) and 16 times during the evening peak period (between 3 P.M. and 7 P.M.) for a total of 28 trips over 7 hours, giving it an average frequency of 15.0 minutes meeting the HQTAs criteria. In addition, the City of Los Angeles ZIMAS system identifies the Project Site as being located within a TPA, defined as an area within one-half mile of a major transit stop that is existing or planned<sup>3,4,5</sup>. As such, the Project is consistent with this criterion.

<sup>1</sup> SCAG, 2020. Connect SoCal 2020–2045 RTP/SCS, page 165. Available at: <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>, accessed August 29, 2022.

<sup>2</sup> SCAG, 2020. Connect SoCal 2020–2045 RTP/SCS, <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>, accessed September 8, 2022.

<sup>3</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>4</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>5</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

# Chapter 4

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## Connect SoCal 2020 Program EIR

### Mitigation Measures

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior EIRs applicable to the Project include SCAG's 2020–2045 RTP/SCS (Connect SoCal 2020) Program EIR.

The Mitigation Monitoring and Reporting Program (MMRP) for the Connect SoCal 2020 Program EIR include programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

Specifically, the Connect SoCal 2020 Program EIR states that project-level mitigation measures outlined in the MMRP should be considered and implemented by a lead agency and project applicant during project-specific environmental reviews, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. However, since SCAG has no authority to impose mitigation measures, a lead agency must use its independent discretion to determine whether mitigation measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in SCAG's Program EIR as appropriate to address project-specific conditions. In compliance with PRC Section 21151.2, the City has reviewed all of the mitigation measures in the MMRP and determined their potential applicability to the Project. This applicability analysis is included in the analysis below for each environmental issue identified under Appendix G of the of the State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) the MMRP's mitigation measure; (2) an equally effective City mitigation measure (consistent with the MMRP mitigation measures); (3) federal, state, regional, or City regulation; or (4) no mitigation, as there was no potential for a significant environmental effect. The City's applicability determination is found in **Table 5-1, *Project Consistency with Connect SoCal 2020 Mitigation Measures***.

**TABLE 4-1**  
**PROJECT CONSISTENCY WITH CONNECT SOCAL 2020 MITIGATION MEASURES**

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
<b>Aesthetics (AES)</b>		
<p><b>AES-1:</b> Potential for the Project to have a substantial adverse effect on a scenic vista.</p>	<p><b>PMM AES-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.</li> <li>b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</li> <li>c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</li> <li>d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</li> <li>e) Retain or replace trees bordering highways, so that clear-cutting is not evident.</li> <li>f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is</li> </ul>	<p><b>No mitigation applies.</b> Public Resources Code (PRC) Section 21099, enacted by Senate Bill (SB) 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within Transit Priority Areas (TPAs) pursuant to CEQA. The Project includes development of a residential building with 210 dwelling units within a City-designated TPA and within a SCAG-designated High Quality Transit Area (HQTA) and TPA. As such, the Project’s aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure into the Project is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>complementary to the dominant landscaping or native habitats of surrounding areas.</p> <p>g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity,</p> <p>h) Use see-through safety barrier designs (e.g. railings rather than walls).</p>	
<p><b>AES-2:</b> Potential for the Project to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.</p>	<p>No mitigation required.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM AES-1 above.</p>
<p><b>AES-3:</b> Potential for the Project to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality.</p>	<p><b>PMM AES-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.</p> <p>b) Design landscaping along highway corridors to add significant natural elements and visual</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM AES-1 above.</p>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>interest to soften the hard-edged, linear transportation corridors.</p> <p>c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.</p> <p>d) Design projects consistent with design guidelines of applicable general plans.</p> <p>e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.</p> <p>f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:</p> <ul style="list-style-type: none"> <li>– use transparent panels to preserve views where sound walls would block views from residences;</li> <li>– use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; and</li> <li>– construct sound walls of materials whose color and texture complements the surrounding landscape and development.</li> </ul>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
<p><b>AES-4:</b> Potential for the Project to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</p>	<p><b>PMM AES-3:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.</li> <li>b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.</li> <li>c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.</li> <li>d) Use unidirectional lighting to avoid light trespass onto adjacent properties.</li> <li>e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.</li> </ul>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM AES-1 above.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	
<b>Agricultural and Forestry Resources (AG)</b>		
<b>AG-1:</b> Potential for the Project to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.	<b>PMM AG-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.	<b>No mitigation applies.</b> No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) exists on or in the vicinity of the Project Site. <sup>2</sup> The Project Site is located in an urbanized area of the city and currently contains six buildings occupied by creative office and warehouse uses and associated surface-level parking. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. Thus, incorporation of this mitigation measure into the Project is not required.

<sup>2</sup> California Department of Conservation, 2018, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed August 12, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>c) Maintain and expand agricultural land protections such as urban growth boundaries.</p> <p>d) Provide for mitigation fees to support a mitigation bank<sup>1</sup> that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.</p> <p>e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.</p> <p>f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</p>	
<p><b>AG-2:</b> Potential for the Project to conflict with existing zoning for agricultural use, or a Williamson Act contract.</p>	<p><b>PMM AG-2:</b> Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p>	<p><b>No mitigation applies.</b> The Project Site is not zoned for agricultural production, there is no farmland in the Project vicinity, and no nearby lands are enrolled under the Williamson Act.<sup>3,4,5</sup> The Project Site is located in an urbanized area of the city and currently contains six buildings occupied by creative office and warehouse uses and associated surface-level parking. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.</p>

<sup>1</sup> The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website. California Department of Fish and Wildlife, Banking. Available at: <https://www.wildlife.ca.gov/Conservation/Planning/Banking>. Accessed September 1, 2022.

<sup>3</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>4</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>5</sup> City of Los Angeles Department of City Planning, 2022, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</p> <p>b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.</p>	Thus, application of this mitigation measure to the Project is not required.
<p><b>AG-3:</b> Potential for the Project to 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)).</p>	<p><b>PMM AG-3:</b> Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.</p>	<p><b>No mitigation applies.</b> The Project Site and surrounding vicinity are not zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the city and currently contains six buildings occupied by creative office and warehouse uses and associated surface-level parking. Thus, incorporation of this mitigation measure is not required.</p>
<p><b>AG-4:</b> Potential for the Project to result in the loss of forest land or conversion of forest land to non-forest use.</p>	<p><b>PMM AG-3.</b> See above.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM AG-3 above.</p>
<p><b>AG-5:</b> Potential for the Project to 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</p>	<p><b>PMM AG-2 and PMM GHG-1.</b> See above and below.</p> <p><b>PMM AG-4:</b> Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the</p>	<p><b>No mitigation applies.</b> The Project Site is currently not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land would be converted to non-forest uses. The Project Site is located in an urbanized area of the city and currently contains six buildings</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
<p>conversion of forest land to non-forest use.</p>	<p>conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <ul style="list-style-type: none"> <li>a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.</li> <li>b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.</li> <li>c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.</li> </ul> <p><b>PMM AG-5:</b> Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:</p>	<p>occupied by creative office and warehouse uses and associated surface-level parking. Thus, incorporation of this mitigation measure is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.</p>	
<b>Air Quality (AQ)</b>		
<p><b>AQ-1:</b> Conflict with or obstruct implementation of the applicable air quality plan.</p>	<p>No mitigation required.</p>	<p><b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><b>AQ-2:</b> Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p><b>PMM AQ-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Minimize land disturbance.</p>	<p><b>No mitigation applies.</b> The analysis of the Project's potential air quality impacts in Chapter 5, <i>Initial Study and Environmental Analysis</i>, of this SCEA concluded that the Project would not generate pollutant emissions in excess of applicable significance thresholds and would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. No significant impacts related to this issue have been identified, and no mitigation measures are required. Additionally, the Project would implement PDF-</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</p> <p>c) Cover trucks when hauling dirt.</p> <p>d) Stabilize the surface of dirt piles if not removed immediately.</p> <p>e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.</p> <p>f) Minimize unnecessary vehicular and machinery activities.</p> <p>g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</p> <p>i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.</p> <p>j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.</p> <p>k) Ensure that all construction equipment is properly tuned and maintained.</p>	<p>AIR-1 to minimize construction-related emissions. Thus, incorporation of this mitigation measure is not required. Notwithstanding, various of the measures identified by PMM AQ-1 are already required to be implemented for the Project pursuant to the requirements of SCAQMD Rule 403, CARB's Anti-Idling Regulations, the City's standard requirement to prepare a Construction Management Plan, and other standard regulatory requirements that will be imposed upon the Project as part of its City plan check approval process.</p> <p><b>PDF AIR-1:</b> Construction equipment operating at the Project Site shall be subject to the requirements listed below. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.</p> <ul style="list-style-type: none"> <li>• Prior to the issuance of a grading or building permit for each phase, an inventory of off-road heavy-duty construction equipment for that phase of construction, equal to or greater than 50 horsepower that will be used an aggregate of 40 or more hours, shall be provided to the Department of Building and Safety and the Department of City Planning. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality</li> </ul>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.</p> <p>m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.</p> <p>n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.</p> <p>o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.</p> <p>p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.</p>	<p>Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</p> <ul style="list-style-type: none"> <li>• Off-road diesel-powered equipment within the construction inventory shall meet the Tier 4 final off-road emissions standards within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board certified Level 3 Diesel Particulate Filter or equivalent;</li> <li>• All cranes and welders shall be electric-powered;</li> <li>• Forklifts shall be natural gas-powered;</li> <li>• The Project shall utilize low-VOC coatings where commercially available during construction activities to avoid excessive VOC emissions; and</li> <li>• Trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities.</li> </ul>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer’s recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.</p> <p>r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> <li>a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.</li> <li>b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.</li> <li>c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.</li> </ul> <p>w) As applicable for port projects, the following measures should be considered:</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).</li> <li>b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.</li> <li>c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.</li> <li>d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.</li> <li>e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.</li> <li>f. Encourage the participation in the Green Ship Incentives.</li> <li>g. Offer incentives to encourage the use of on-dock rail.</li> <li>x) As applicable for rail projects, the following measures should be considered: <ul style="list-style-type: none"> <li>a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.</li> </ul> </li> <li>y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources</li> </ul>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.</p> <p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p> <ul style="list-style-type: none"> <li>a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.</li> <li>b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.</li> <li>c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.</li> <li>d. Provide information to residents on where MERV filters can be purchased.</li> <li>e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.</li> <li>f. Identify the responsible entity such as future residents themselves, Homeowner’s Association, or property managers for ensuring enhanced filtration units are replaced on time.</li> <li>g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.</li> </ul>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and</li> <li>i. Develop a process for evaluating the effectiveness of the enhanced filtration units.</li> <li>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities</li> </ul>	
<b>AQ-3:</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.	<b>PMM AQ-1.</b> See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM AQ-1 above.
<b>AQ-4:</b> Expose sensitive receptors to substantial pollutant concentrations.	<b>PMM AQ-1.</b> See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM AQ-1 above.
<b>AQ-5:</b> Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>Biological Resources (BIO)</b>		
<b>BIO-1:</b> Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.	<b>PMM BIO-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	<b>No mitigation applies.</b> The Project is located in a fully urbanized area. The Project would construct a residential building on the Project Site, which is currently improved with six buildings occupied by creative office and warehouse uses and associated surface-level parking. The Project would not be developed on open space, and development of the Project would not result in adverse effects to any species identified as a candidate, sensitive, or special status species in

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.</p> <p>b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:</p> <ul style="list-style-type: none"> <li>i. Impact minimization strategies</li> <li>ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts</li> <li>iii. Use of in-kind mitigation bank credits</li> <li>iv. Funding of research and recovery efforts</li> <li>v. Habitat restoration</li> <li>vi. Establishment of conservation easements</li> <li>vii. Permanent dedication of in-kind habitat</li> </ul> <p>c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.</p> <p>d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.</p>	<p>local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or the California Native Plant Society. The Project would also not result in any adverse effects to any occupied habitat, potentially suitable habitat, or designated critical habitat. Furthermore, as described in the Tree Report prepared for the Project (Appendix B), the Project Site does not contain any on-site trees and would not impact any off-site trees. Therefore, development of the Project would not result in adverse effects to any candidate, sensitive, or special status plant species.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.</li> <li>f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.</li> <li>g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.</li> <li>h) Appoint a qualified biologist to monitor implementation of mitigation measures.</li> <li>i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.</li> <li>j) Develop an invasive species control plan associated with project construction.</li> <li>k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.</li> <li>l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.</li> </ul>	



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.</p>	
<p><b>BIO-2:</b> Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.</p>	<p><b>PMM BIO-1.</b> See above.  <b>PMM BIO-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.</li> <li>b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests</li> </ul>	<p><b>No mitigation applies.</b> The Project is located in a fully urbanized area. The Project would construct a residential building on the Project Site, which is currently improved with six buildings occupied by creative office and warehouse uses and associated surface-level parking. The Project would not be developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Moreover, as discussed above under the PMM BIO-1 consistency analysis, the Project Site does not contain any trees. Thus, application of this mitigation measure to the Project is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <p>c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <p>d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.</p> <p>e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.</p> <p>f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.</p> <p>g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</p> <p>h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e.,</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.</p> <ul style="list-style-type: none"> <li>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</li> <li>j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.</li> <li>k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.</li> <li>l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.</li> <li>m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.</li> <li>n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.</li> <li>o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species,</li> </ul>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.</p> <p>p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.</p> <p>q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</p> <p>r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</p>	
<p><b>BIO-3:</b> 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.</p>	<p><b>PMM BIO-1</b> and <b>PMM BIO-2.</b> See above.</p> <p><b>PMM BIO-3:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <p>a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.</p>	<p><b>No mitigation applies.</b> The Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.<sup>6</sup> Thus, application of this mitigation measure to the Project is not required.</p>

<sup>6</sup> United States Fish and Wildlife Service, 2022, National Wetlands Inventory, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed September 20, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.</p> <p>c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE’s Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration’s performance standard of “no net loss of wetlands” a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> <li>– Permittee-responsible mitigation</li> <li>– Contribution of in-kind in-lieu fees</li> <li>– Use of in-kind mitigation bank credits</li> <li>– Where avoidance is determined to be infeasible and</li> </ul> <p>d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> <li>– Avoidance;</li> <li>– Impact Minimization;</li> <li>– On-site alternatives; and</li> <li>– Off-site alternatives.</li> </ul> <p>e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
<p><b>BIO-4:</b> 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.</p>	<p><b>PMM BIO-1</b> through <b>PMM BIO-3</b>. See above</p> <p><b>PMM BIO-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.</li> <li>b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.</li> <li>c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.</li> <li>d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.</li> <li>e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection</li> </ul>	<p><b>No mitigation applies.</b> The Project Site is located in a developed, urban area and the Project would construct a residential building on the Project Site, which is currently improved with six buildings occupied by creative office and warehouse uses and associated surface-level parking. The Project Site is surrounded by other existing urban uses including commercial uses and multi-family residences. As such, the Project would not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. Therefore, development of the Project Site would not interfere with the movement of any native resident or migratory fish or wildlife species; with established native resident or migratory wildlife corridors; or impede the use of native wildlife nursery sites. Thus, application of this mitigation measure to the Project is not required.</p>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>pursuant to the Migratory Bird Treaty Act, during the breeding season.</p> <p>f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.</p> <p>g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.</p> <p>h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.</p> <p>i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.</p> <p>j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.</p> <p>k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</p> <p>l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.</p> <p>n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:</p> <ul style="list-style-type: none"> <li>– Wildlife movement buffer zones</li> <li>– Corridor realignment</li> <li>– Appropriately spaced breaks in center barriers</li> <li>– Stream rerouting</li> <li>– Culverts</li> <li>– Creation of artificial movement corridors such as freeway under- or overpasses</li> </ul>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>– Other comparable measures</li> <li>p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.</li> <li>q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.</li> </ul>	
<p><b>BIO-5:</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p><b>PMM BIO-1</b> through <b>PMM BIO-4</b>. See above</p> <p><b>PMM BIO-5:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</li> <li>b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.</li> <li>c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for</li> </ul>	<p><b>No mitigation applies.</b> The Project Site is located in a developed, urban area. The Project would not be developed on existing open space or sensitive habitat. As described above under PMM BIO-1, the Project Site does not contain any trees. As such, the Project would not have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Thus, incorporation of the mitigation measure is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.</p> <p>d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.</p> <p>e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p> <p>g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.</p> <p>h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>avoid conflicts with local policies and ordinances protecting biological resources</p> <p>i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none"> <li>– Avoidance strategies</li> <li>– Contribution of in-lieu fees</li> <li>– Planting of replacement trees</li> <li>– Re-landscaping areas with native vegetation post-construction</li> <li>– Other comparable measures developed in consultation with local agency and certified arborist.</li> </ul>	
<p><b>BIO 6:</b> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.</p>	<p><b>PMM BIO-1</b> through <b>PMM BIO-5.</b> See above.</p> <p><b>PMM BIO-6:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>No mitigation applies.</b> The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.<sup>7</sup> Furthermore, the Project Site is not within or adjacent to any existing Significant Ecological Area.<sup>8,9</sup> Thus, incorporation of the mitigation measure is not required.</p>

<sup>7</sup> California Department of Fish and Wildlife, 2019, California Natural Community Conservation Plans, April 2019, <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>, accessed on September 8, 2022.

<sup>8</sup> Los Angeles County, 2015, Significant Ecological Areas and Coastal Resource Areas Policy Map, [https://planning.lacounty.gov/assets/upl/project/gp\\_2035\\_2014-FIG\\_9-3\\_significant\\_ecological\\_areas.pdf](https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf), accessed September 8, 2022.

<sup>9</sup> Los Angeles County, 2022, GIS-NET Public, <https://planning.lacounty.gov/gisnet>, accessed September 8, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.</p> <p>b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.</p> <p>c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.</p>	
<b>Cultural Resources (CULT)</b>		
<p><b>CULT-1:</b> Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.</p>	<p><b>PMM CULT-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Pursuant to <i>CEQA Guidelines</i> Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area</p>	<p><b>Mitigation applies.</b> Consistent with PMM CULT-1, a Historical Resources Assessment was prepared for the Project that determined that the Project would not result in any significant impacts on any historical resource.</p> <p>Regarding archaeological resources, the City has determined that MM CULT-1 shall be incorporated into the Project, which is tailored to specifically address potential Project-specific impacts. With implementation of this mitigation measure, potential impacts resulting from the inadvertent discovery of archaeological resources will be less than significant.</p>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>has been previously surveyed and whether historical resources were identified.</p> <p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>– Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If</li> </ul>	<p><b>MM CULT-1:</b> Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work which shall exceed 2-feet in depth, such as demolition, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.</p> <p>Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.</p> <p>In the event that historic or prehistoric archaeological resources (e.g., bottles,</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>resources would be impacted, impacts should be minimized to the extent feasible.</p> <ul style="list-style-type: none"> <li>– Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.</li> </ul> <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior’s Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p> <p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the</p>	<p>foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.</p> <p>All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Los Angeles (City) to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted</p>	<p>History Museum of Los Angeles County, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.</p> <p>The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p> <p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP’s Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p> <p>j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS</p> <p>k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist,</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.</p> <p>l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p>	
<p><b>CULT-2:</b> Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.</p>	<p><b>PMM CULT-1.</b> See above.</p>	<p><b>Mitigation applies.</b> See discussion of PMM CULT-1 above.</p>
<p><b>CULT-3:</b> Disturb human remains, including those interred outside of dedicated cemeteries.</p>	<p><b>PMM CULT-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>Mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with MM CULT-2, which is equal to or more effective than PMM CULT-2. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.</p> <p>b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:</p> <ul style="list-style-type: none"> <li>– Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.</li> <li>– If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his</li> </ul>	<p>The City has determined that MM CULT-2 shall be incorporated into the Project, which is tailored to specifically address potential Project-specific impacts. With implementation of this mitigation measure, potential impacts resulting from the inadvertent discovery of human remains will be less than significant.</p> <p><b>MM CULT-2:</b> If human remains are encountered, the Project applicant shall halt work in the vicinity (within 100 feet) of the discovery and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC shall be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendent (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and reburial of the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	
<b>Energy (ENR)</b>		
<b>ENR-1:</b> Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>ENR-2:</b> Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>Geology and Soils (GEO)</b>		
<b>GEO-1:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.



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seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.		
<b>GEO-2:</b> Result in substantial soil erosion or the loss of topsoil.	<p><b>PMM GEO-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.</li> <li>b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and</li> </ul>	<p><b>No mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM GEO-1. The Applicant would be required to implement the provisions of the South Coast Air Quality Management District's (SCAQMD) Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.).</p>

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	<p>maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.</p> <p>c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</p> <p>d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.</p>	<p>The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities. Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil. Thus, application of this mitigation measure to the Project is not required.</p>
<p><b>GEO-3:</b> 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.</p>	<p>No mitigation required.</p>	<p><b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>

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<b>GEO-4:</b> Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>GEO-5:</b> Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No mitigation required.	<b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>GEO-6:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<p><b>PMM GEO-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.</p> <p>b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal</p>	<p><b>Mitigation applies.</b> Consistent with PMM GEO-2, the City has considered mitigation measures to reduce substantial adverse effects related to paleontological resources. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Sites (refer to Appendix F). The records search revealed that no vertebrate fossil localities have been identified at the Project Site, but fossil localities have been identified nearby within the same sedimentary deposits that occur at the Project Site.</p> <p>The City has determined that MM GEO-1 and MM GEO-2 shall be incorporated into the Project, which are tailored to specifically address potential Project-specific impacts. With implementation of these mitigation measures, potential impacts resulting from the inadvertent discovery of paleontological resources will be less than significant.</p>

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	<p>Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> <li>1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.</li> <li>2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should</li> </ol>	<p><b>MM GEO-1:</b> Prior to any Project ground disturbance activities, a qualified paleontologist shall be retained by the Applicant to prepare a Worker’s Environmental Awareness Program (WEAP) and train all construction personnel prior to the start of any construction activities. The WEAP training shall include, at a minimum, the following information:</p> <ul style="list-style-type: none"> <li>• Review of local and State laws and regulations pertaining to paleontological resources;</li> <li>• Types of fossils that could be encountered during ground disturbing activity;</li> <li>• Photos of example fossils based on the regional LACM collections that could occur on site for reference; and</li> <li>• Instructions on the procedures to be implemented should unanticipated fossils be encountered during construction, including stopping work in the vicinity of the find and contacting a qualified professional paleontologist.</li> </ul> <p><b>MM GEO-2:</b> In the event an unanticipated fossil discovery is made during ground disturbing activities, construction activities shall halt in the immediate vicinity of the fossil, and the qualified professional paleontologist retained by the Applicant shall be notified to evaluate the discovery, determine its significance, and evaluate whether additional mitigation or treatment is warranted. Work in the area of the discovery shall</p>

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	<p>adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP.</p> <p>3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.</p> <p>4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.</p> <p>e) Avoid routes and project designs that would permanently alter unique geological features.</p> <p>f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</p> <p>g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.</p>	<p>resume once the find is properly documented and authorization is given by the qualified paleontologist to resume construction work. Any significant paleontological resources found shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository.</p>

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	<p>h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.</p>	
<b>Greenhouse Gas Emissions and Climate Change (GHG)</b>		
<p><b>GHG-1:</b> Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p><b>PMM GHG-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: <ul style="list-style-type: none"> <li>i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.</li> </ul> </li> </ul>	<p><b>No mitigation applies.</b> As discussed in detail in Chapter 5, <i>Initial Study and Environmental Analysis</i>, the Project’s generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. Thus, incorporation of this mitigation measure into the Project is not required. Moreover, pursuant to California Public Resources Code Section 21159.28(a), a Sustainable Communities Environmental Assessment prepared for a residential or mixed use development that is consistent with the RTP/SCS, such as the Project, need not analyze or discuss project specific or cumulative greenhouse gas emission impacts from mobile source emissions generated by cars and light duty trucks.</p>

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	<ul style="list-style-type: none"> <li>iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.</li> <li>iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.</li> <li>v. Use high-efficiency lighting and cooking devices.</li> <li>vi. Incorporate passive solar design.</li> <li>vii. Use high-reflectivity building materials and multiple glazing.</li> <li>viii. Prohibit gas-powered landscape maintenance equipment.</li> <li>ix. Install electric vehicle charging stations.</li> <li>x. Reduce wood burning stoves or fireplaces.</li> <li>xi. Provide bike lanes accessibility and parking at residential developments.</li> <li>b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.</li> <li>c) Include off-site measures to mitigate a project's emissions.</li> <li>d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:               <ul style="list-style-type: none"> <li>i. Use energy and fuel-efficient vehicles and equipment;</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>ii. Deployment of zero- and/or near zero emission technologies;</li> <li>iii. Use lighting systems that are energy efficient, such as LED technology;</li> <li>iv. Use the minimum feasible amount of GHG-emitting construction materials;</li> <li>v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;</li> <li>vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;</li> <li>vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;</li> <li>viii. Incorporate design measures to reduce water consumption;</li> <li>ix. Use lighter-colored pavement where feasible;</li> <li>x. Recycle construction debris to maximum extent feasible;</li> <li>xi. Plant shade trees in or near construction projects where feasible; and</li> <li>xii. Solicit bids that include concepts listed above.</li> </ul> <p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>i. Promote transit-active transportation coordinated strategies;</li> </ul>	



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	<ul style="list-style-type: none"> <li>ii. Increase bicycle carrying capacity on transit and rail vehicles;</li> <li>iii. Improve or increase access to transit;</li> <li>iv. Increase access to common goods and services, such as groceries, schools, and day care;</li> <li>v. Incorporate affordable housing into the project;</li> <li>vi. Incorporate the neighborhood electric vehicle network;</li> <li>vii. Orient the project toward transit, bicycle and pedestrian facilities;</li> <li>viii. Improve pedestrian or bicycle networks, or transit service;</li> <li>ix. Provide traffic calming measures;</li> <li>x. Provide bicycle parking;</li> <li>xi. Limit or eliminate park supply;</li> <li>xii. Unbundle parking costs;</li> <li>xiii. Provide parking cash-out programs; and</li> <li>xiv. Implement or provide access to commute reduction program.</li> <li>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;</li> <li>g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and</li> <li>h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and</li> </ul>	

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	<p>carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> <li>i. Provide car-sharing, bike sharing, and ride-sharing programs;</li> <li>ii. Provide transit passes;</li> <li>iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;</li> <li>iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;</li> <li>v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;</li> <li>vi. Provide employee transportation coordinators at employment sites;</li> <li>vii. Provide a guaranteed ride home service to users of non-auto modes.</li> </ul> <ul style="list-style-type: none"> <li>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</li> <li>j) Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> <li>i. Developing on infill and brownfields sites;</li> <li>ii. Building compact and mixed-use developments near transit;</li> <li>iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions</li> </ul> </li> </ul>	

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	<p>vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and</p> <p>v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.</p> <p>k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.</p>	
<p><b>GHG-2:</b> Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p><b>PMM GHG-1.</b> See above.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM GHG-1 above.</p>
<b>Hazards and Hazardous Materials (HAZ)</b>		
<p><b>HAZ-1:</b> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	<p><b>PMM HAZ-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where the construction or operation of projects involves the transport of hazardous material,</p>	<p><b>Mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HAZ-1. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would</p>

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	<p>provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.</p> <p>b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.</p> <p>c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:</p> <ul style="list-style-type: none"> <li>– The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.</li> <li>– The location of such hazardous materials.</li> </ul>	<p>require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities. The Project includes demolition and removal of the existing uses from the Project Site and development of the Project Site with a residential building, including 210 dwelling units, similar to other residential development already found in the Project Site area and region. The Project would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Thus, application of this mitigation measure to the Project is not required.</p> <p>In addition, the Phase I Environmental Site Assessments (ESA) prepared for the Project (Appendix H-1) identified a recognized environmental condition (REC) and a business environmental risk (BER) in connection with the Project Site. Based on the identified subsurface contamination, the Phase I ESA determined that the historical use of the Project Site for circuit board etching, plating, and fabrication activities represents a REC. Due to the age of the buildings on site, the Project Site was identified as a BER since there is the potential for asbestos containing materials (ACM) and lead based paint (LBP) to be present in the existing structures.</p> <p>To address potentially significant impacts related to the subsurface contamination at the Project Site, as discussed under the response to Checklist Question IX.a in Chapter 5, <i>Initial Study and Environmental Analysis</i>, the Applicant would</p>

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	<ul style="list-style-type: none"> <li>– An emergency response plan including employee training information.</li> <li>– A plan that describes the way these materials are handled, transported and disposed.</li> <li>d) Follow manufacturer’s recommendations on use, storage, and disposal of chemical products used in construction.</li> <li>e) Avoid overtopping construction equipment fuel gas tanks.</li> <li>f) Properly contain and remove grease and oils during routine maintenance of construction equipment.</li> <li>g) Properly dispose of discarded containers of fuels and other chemicals.</li> <li>h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.</li> <li>i) Identify and implement more stringent tank car safety standards.</li> <li>j) Improve rail transportation route analysis, and modification of routes based on that analysis.</li> <li>k) Use the best available inspection equipment and protocols and implement positive train control.</li> <li>l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.</li> <li>m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.</li> <li>n) Notify in advance county and city emergency operations offices of all crude oil shipments,</li> </ul>	<p>implement the recommendations provided in Geosyntec’s Phase II ESA (Appendix H-2), including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a Soils and Materials Management Plan (SMMP) during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1. Due to the presumed presence of ACM and LBP at the Project Site, compliance with all applicable City, State, and federal regulations regarding investigation and removal of these materials would be required. Furthermore, implementation of the vapor barrier beneath the proposed construction would address the existing human health risk on the Project Site from the existing vapor intrusion.</p> <p><b>MM HAZ-1:</b> To further reduce potential impacts, the Project shall implement the following measures, as described below:</p> <ul style="list-style-type: none"> <li>• The Applicant shall obtain Oversight Agency approval of additional soil investigation consisting of the collection of soil samples within the footprints of the buildings at 4112, 4132, and 4136 Del Rey. The soil samples from these locations shall be analyzed for metals, and samples collected near the historical clarifier at 4136 Del Rey should include analysis of VOCs.</li> <li>• The Applicant shall obtain Oversight Agency approval of a Soils and Materials Management Plan (SMMP) to be implemented during all ground disturbing activities. The SMMP shall include information related to the Project Site</li> </ul>

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	<p>including a contact number that can provide real-time information in the event of an oil train derailment or accident.</p> <p>o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.</p> <p>p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.</p> <p>q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.</p>	<p>history, previous investigation results (including the additional soil investigations at 4112, 4132, and 4136 Del Rey Avenue), and impacts to soil, and outline protocols for identifying, handling, and disposing of impacted soil in conformance with all applicable regulatory requirements.</p> <ul style="list-style-type: none"> <li>Any additional groundwater investigations, if required, shall be developed in coordination with the Oversight Agency and completed in general accordance with State of California environmental regulations.</li> <li>The Applicant shall obtain Oversight Agency approval of and install a vapor barrier beneath the new proposed construction.</li> <li>Any additional evaluations of indoor air, if required, shall be developed in coordination with the Oversight Agency and completed in general accordance with State of California environmental regulations.</li> </ul> <p>Therefore, the City has determined that the Project’s compliance with existing regulatory requirements as well as implementation of MM HAZ-1 would be more effective than PMM HAZ-1.</p>
<p><b>HAZ-2:</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.</p>	<p><b>MM-HAZ-1(b).</b> See above.</p> <p><b>PMM HAZ-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may</p>	<p><b>Mitigation applies.</b> The Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation. Thus, incorporation of this mitigation measure is not required.</p> <p>However, as part of the Phase I ESA for the Project Site (Appendix H-1), a review of all major governmental databases was conducted for any information related to hazardous materials on, or in the immediate vicinity, of the Project Site. The</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;</li> <li>b) More stringent tank car safety standards;</li> <li>c) Improved rail transportation route analysis, and modification of routes based on that analysis;</li> <li>d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;</li> <li>e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;</li> <li>f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;</li> <li>g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;</li> <li>h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.</li> </ul>	<p>Project's listing in these databases is associated with prior industrial uses on the Project Site, including Western Circuits, Inc. which conducted circuit board etching, plating, and fabrication activities. To mitigate any potential impacts resulting from the Project Site's former industrial uses, the Applicant would implement the recommendations provided in Geosyntec's Phase II ESA (Appendix H-2), including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a Soils and Materials Management Plan (SMMP) during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1..</p> <p>In addition, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This would ensure that potential risks associated with construction related activities are minimized.</p> <p>Moreover, as described above under PMM HAZ-1, the removal of any identified ACM or LBP would be abated/removed in conformance with all applicable regulatory requirements, thereby eliminating any risk of creating a significant hazard.</p>

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<p><b>HAZ-3:</b> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p>	<p>PMM HAZ-1 and PMM HAZ-2. See above.</p> <p><b>PMM HAZ-3:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible.</li> <li>b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.</li> </ul>	<p><b>No mitigation applies.</b> No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is Morning Glory Preschool, located approximately 0.27 mile northwest of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Thus, application of this mitigation measure is not required.</p>
<p><b>HAZ-4:</b> 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.</p>	<p><b>PMM HAZ-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I</li> </ul>	<p>The Project would be in <b>substantial conformance</b> with these mitigation measures for the reasons stated below.</p> <p>As part of the Phase I ESA prepared for the Project Site (Appendix H-1), regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The databases searched as a result of Government Code Section 65962.5 are known as the “Cortese List” and include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency</p>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.</p> <p>b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.</p> <p>c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.</p> <p>d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.</p> <p>e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator</p>	<p>(CalEPA). The Project Site is identified as a Los Angeles County - CUPA Program Records, Hazardous Waste Manifest Data, Toxic Pollutant Emissions Facilities, Facility Registry Service/Facility Index, Historical Hazardous Waste Manifest Data, Los Angeles County – City of Los Angeles Hazardous Materials Facilities, Comprehensive Environmental Response, Compensation and Liability Information System, California Environmental Reporting System, Hazardous Waste Sites, EnviroStor Database, EnviroStor Hazardous Waste Facilities, Resource Conservation and Recovery Act, Corrective Action, RCRA Small Quantity Generators List, Superfund Enterprise Management System, Archived Site, and Toxics Release Inventory Program site (Appendix H-1). The Project’s listing in these databases is associated with prior industrial uses on the Project Site, including Western Circuits, Inc. which conducted circuit board etching, plating, and fabrication activities. To mitigate any potential impacts resulting from the Project Site’s former industrial uses, the Applicant would implement the recommendations provided in Geosyntec’s Phase II ESA (Appendix H-2), including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a Soils and Materials Management Plan (SMMP) during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1.</p> <p>Furthermore, as described above under PMM HAZ-1, the removal of any identified ACM or LBP would be abated/removed in conformance with all</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.</p> <p>f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.</p> <p>g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</p> <p>h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p>	<p>applicable regulatory requirements, thereby eliminating any risk of creating a significant hazard. These regulatory requirements are consistent with the relevant measures identified in PMM HAZ-4 for ACM and LBP.</p> <p>Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.</p> <p>j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</p> <p>k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.</p> <p>l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>prevent any further environmental contamination as a result of construction.</p> <p>m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <p>n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</p> <p>o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified</p>	

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
<b>HAZ-5:</b> 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.	<b>PMM NOISE-1.</b> See below.	<b>No mitigation applies.</b> While the Santa Monica Municipal Airport is located approximately 1.6 miles from the Project Site, the Project Site is not located within the Airport Influence Area of the Santa Monica Municipal Airport and, thus, this mitigation does not apply. <sup>10</sup>
<b>HAZ-6:</b> Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	<b>PMM HAZ-1 through PMM HAZ-4, and PMM TRA-2.</b> See above and below. <b>PMM HAZ-5:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of	<b>No mitigation applies.</b> The City has determined that this mitigation measure does not apply to the Project, because the mitigation measure is directed toward municipalities with control over transportation/circulation, conveyance of emergency information, and evaluation of emergency routes. The mitigation measure is not applicable to the Project.

<sup>10</sup> Los Angeles County Airport Land Use Commission, 2003, Santa Monica Municipal Airport Influence Area, <https://planning.lacounty.gov/aluc/airports>, accessed August 19, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>projected transportation and circulation conditions.</p> <p>b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;</p> <p>c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.</p>	
<p><b>HAZ-7:</b> Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.</p>	<p><b>PMM WF-1.</b> See below.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM WF-1 below.</p>
<p><b>Hydrology and Water Quality (HYD)</b></p>		
<p><b>HYD-1:</b> Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.</p>	<p><b>PMM HYD-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</p> <p>b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</p> <p>c) Comply with the Caltrans storm water discharge permit as applicable; and identify</p>	<p><b>No mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HYD-1. The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would comply with Los Angeles Municipal Code (LAMC) Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.</p> <p>d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.</p> <p>e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</p> <p>f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse:</p> <p>g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.</p> <p>h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities.</p> <p>i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such</p>	<p>comply with the City’s Low Impact Development (LID) Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City’s Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The Project would be subject to the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City’s discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City’s LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the runoff volume produced by the 85th percentile storm event in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Stormwater and Urban Runoff Pollution Control</p>

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	<p>as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.</p> <p>j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff.</p> <p>k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.</p> <p>l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.</p> <p>m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.</p>	<p>Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities. Thus, application of this mitigation measure to the Project is not required.</p>
<p><b>HYD-2:</b> Potential to substantially decrease groundwater supplies or interfere substantially with groundwater</p>	<p><b>PMM HYD-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a</p>	<p><b>No mitigation applies.</b> The Project Site is fully developed with impervious surfaces and is not a significant area of groundwater recharge. Thus,</p>



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recharge such that the project may impede sustainable groundwater management of the basin.	<p>project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.</li> <li>b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.</li> <li>c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.</li> <li>d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</li> </ul>	application of this mitigation measure to the Project is not required.
<b>HYD-3a:</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the	<b>PMM HYD-1.</b> See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM HYD-1 above.

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course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.		
<b>HYD-3b:</b> 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 substantially increase the rate or amount of flooding on- or off-site.	PMM HYD-1 and PMM HYD-2. See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM HYD-1 and PMM HYD-2 above.
<b>HYD-3c:</b> 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 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.	PMM HYD-1 and PMM HYD-2. See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM HYD-1 and PMM HYD-2 above.
<b>HYD-4:</b> In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	<b>PMM HYD-4:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and	<b>No mitigation applies.</b> The Project Site is not within a 100-year or 500-year flood hazard area according to Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map. <sup>11</sup> The Project Site is located approximately 1.6 miles inland (east) from the Pacific Ocean; however, the site is not located within a tsunami

<sup>11</sup> Federal Emergency Management Agency (FEMA), FEMA Flood Map Service Center, Information for 4112 Del Rey Avenue, Los Angeles, <https://msc.fema.gov/portal/search#searchresultsanchor>, accessed September 2, 2022.

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	<p>feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p>	<p>hazard area as mapped by the California Department of Conservation.<sup>12</sup> The seiche risk at the Project Site is considered remote as no major water-retaining structures or land-locked bodies of water are located immediately up gradient from the site. In addition, the Project Site is located in an urbanized portion of the city and is relatively flat with intervening structures between the Pacific Ocean and the Project Site, which limits the potential for inundation by mudflow. Thus, incorporation of this mitigation measure is not required.</p>
<p><b>HYD-5:</b> Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.</p>	<p><b>PMM HYD-2.</b> See above.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM HYD-2 above.</p>
<p><b>Land Use and Planning (LU)</b></p>		
<p><b>LU-1:</b> Potential for the Plan to physically divide an established community.</p>	<p><b>PMM LU-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>No mitigation applies.</b> The Project does not include the development of new roadway facilities and would not otherwise physically divide a community. Thus, incorporation of this mitigation measure is not required.</p>

<sup>12</sup> California Department of Conservation, 2019, Tsunami Inundation Map, <https://www.conservation.ca.gov/cgs/tsunami/maps>, accessed September 2, 2022.

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	<p>a) Facilitate good design for land use projects that build upon and improve existing circulation patterns</p> <p>b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:</p> <ul style="list-style-type: none"> <li>– Selecting alignments within or adjacent to existing public rights of way.</li> <li>– Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.</li> <li>– Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).</li> </ul> <p>c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:</p> <ul style="list-style-type: none"> <li>– Alignment shifts to minimize the area affected.</li> <li>– Reduction of the proposed right-of-way take to minimize the overall area of impact.</li> <li>– Provisions for bicycle, pedestrian, and vehicle access across improved roadways.</li> </ul>	
<p><b>LU-2:</b> Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of</p>	<p><b>PMM LU-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation</p>	<p><b>No mitigation applies.</b> As discussed in Chapter 5, <i>Initial Study and Environmental Analysis</i>, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with</p>

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avoiding or mitigating an environmental effect.	<p>measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.</p>	<p>jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation measures are required. Thus, incorporation of this mitigation measure into the Project is not required.</p>
<b>Mineral Resources (MIN)</b>		
<p><b>MIN-1:</b> Potential to 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.</p>	<p><b>PMM MIN-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.</p> <p>b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of</p>	<p><b>No mitigation applies.</b> The Project Site is located in an urbanized part of the city. There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not 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. Thus, application of this mitigation measure to the Project is not required.</p>

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	<p>recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:</p> <ol style="list-style-type: none"> <li>1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.</li> <li>2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.</li> <li>3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations.</li> <li>4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.</li> </ol>	
<p><b>MIN-2:</b> Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a</p>	<p><b>PMM MIN-1.</b> See above.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM MIN-1 above.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
local general plan, specific plan or other land use plan.		
<b>Noise (NOISE)</b>		
<p><b>NOISE-1:</b> 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.</p>	<p><b>PMM NOISE-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ol style="list-style-type: none"> <li>a) Install temporary noise barriers during construction.</li> <li>b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.</li> <li>c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance</li> <li>d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.</li> <li>e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits</li> </ol>	<p><b>Mitigation applies.</b> Consistent with PMM NOISE-1, the City has considered mitigation measures to reduce substantial adverse effects related to noise. The Project Site is located within an urbanized area of the City and unmitigated construction noise levels would exceed the threshold of 5 dBA Leq over the existing ambient noise level at noise-sensitive receptor location R6. The City has determined that MM NOISE-1 shall be incorporated into the Project, which is tailored to specifically address potential Project-specific impacts. With implementation of this mitigation measure, potential impacts resulting from construction noise will be less than significant.</p> <p><b>MM NOISE-1:</b> The Project Applicant shall ensure that noise levels are reduced by 25.5 dBA Leq at the noise-sensitive receptors located directly to the north of the Project Site (e.g., Tribeca Urban Apartments). Noise reduction measures shall consist of one or more of the following measures or other similar measure or measures of equivalent noise reduction effectiveness:</p> <ul style="list-style-type: none"> <li>• Temporary abatement techniques shall include the use of temporary and/or movable shielding for both specific and nonspecific operations. Temporary noise barriers shall be installed along the north side of the Project boundary to shield the nearest residences from construction noise, with a minimum height of 16 feet</li> </ul>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>established in the noise element of the general plan or noise ordinance.</p> <p>f) Designate an on-site construction complaint and enforcement manager for the project.</p> <p>g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.</p> <p>h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <p>i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective</p>	<p>and a maximum height of 20 feet (above finished grade). Temporary noise barriers shall be made of plywood or other similar solid material. Temporary noise barriers will be equipped with sound blankets or sound curtains rated at a sound transmission class (STC) capable of absorbing or attenuating noise attributable to construction equipment by 25.5 dBA. Optionally, a reduction of less than 25.5 dBA from the temporary noise barriers shall be allowed and sound blankets or sound curtains not required, as long as the barrier achieves a minimum reduction of 20 dBA and additional noise reduction measures are implemented (such as those below or other similar measure of equivalent noise reduction effectiveness) such that the total noise reduction at the noise-sensitive receptors located directly to the north of the Project Site (e.g., Tribeca Urban Apartments) sums to 25.5 dBA.</p> <ul style="list-style-type: none"> <li>• Use construction equipment, fixed or mobile, that individually generates less noise than presumed in the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Examples of such equipment are medium, compact, small, or mini model versions of backhoes, cranes, excavators, loaders, or tractors; or newer model equipment; or other applicable equipment that are equipped with reduced noise-generating engines. Construction equipment noise levels shall be</li> </ul>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>barrier between the roadway and sensitive receptors.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned</p> <p>l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</p> <p>m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;</p> <p>n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p> <p>o) Use equipment and trucks with the best available noise control techniques (e.g.,</p>	<p>documented based on manufacturer’s specifications. The construction contractor shall keep construction equipment noise level documentation on-site for the duration of Project construction.</p> <ul style="list-style-type: none"> <li>• Noise-generating equipment operated at the Project Site shall be equipped with California industry standard noise control devices to effectively reduce noise levels, i.e., mufflers, lagging, and/or motor enclosures. All noise-generating equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The reduction in noise level from noise shielding and muffling devices shall be documented based on manufacturer’s specifications. The construction contractor shall keep noise shielding and muffling device documentation on-site and documentation demonstrating that the equipment has been maintained in accordance with the manufacturers’ specifications on-site for the duration of Project construction.</li> <li>• Impact tools used for Project construction shall be hydraulically or electrically powered wherever practicable to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where pneumatic tools are employed, quieter procedures shall be used such as an exhaust muffler on the compressed air exhaust and external jackets to minimize noise impacts.</li> </ul>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.</p> <p>p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p> <p>q) Use of portable barriers in the vicinity of sensitive receptors during construction.</p> <p>r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.</p> <p>s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.</p> <p>t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.</p> <p>u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.</p> <p>v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other</p>	<ul style="list-style-type: none"> <li>• Buffer distances of noise and ground-borne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be implemented to minimize noise impacts.</li> <li>• Construction and demolition activities shall be scheduled to avoid operating more than one piece of motorized equipment simultaneously within 15 feet of the adjacent sensitive receptor's property line.</li> <li>• The effectiveness of the above strategies to achieve the required noise reduction levels shall be documented by on-site noise monitoring conducted by a qualified acoustical analyst using a Type 1 instrument in accordance with the American National Standards Institute (ANSI) S1.4. Noise monitoring shall be conducted during early Project construction activities when the use of heavy equipment is prevalent so long as it can be demonstrated to the City's satisfaction that later construction activities would achieve the requisite noise reductions.</li> </ul>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>appropriate government agency) to provide equivalent noise reduction.</p> <p>w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</p> <p>x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p> <p>y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	
<p><b>NOISE-2:</b> Generation of excessive groundborne vibration or groundborne noise levels.</p>	<p><b>PMM NOISE-1.</b> See above.</p> <p><b>PMM NOISE-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.</p> <p>b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the</p>	<p><b>No mitigation applies.</b> As discussed in the Noise and Vibration Technical Report prepared for the Project (Appendix J), the Project would result in less than significant impacts related to groundborne vibration and groundborne noise and thus, would not require implementation of mitigation measures. As such, application of this mitigation measure to the Project is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.</p> <p>c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.</p> <p>d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.</p> <p>e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).</p> <p>f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.</p>	
<p><b>NOISE-3:</b> 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</p>	<p><b>PMM NOISE-1.</b> See above.</p>	<p><b>No mitigation applies.</b> While the Santa Monica Municipal Airport is located approximately 1.6 miles from the Project Site, the Project Site is not located within the Airport Influence Area of the Santa Monica Municipal Airport and, thus, this mitigation does not apply.<sup>13</sup></p>

<sup>13</sup> Los Angeles County Airport Land Use Commission, 2003, Santa Monica Municipal Airport Influence Area, <https://planning.lacounty.gov/aluc/airports>, accessed August 19, 2022.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
residing or working in the project area to excessive noise levels.		
<b>Population and Housing (POP)</b>		
<b>POP-1:</b> Induce substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure).	No mitigation required.	<b>No mitigation applies.</b> No project-level mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
<b>POP-2:</b> Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	<p><b>PMM POP-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.</li> <li>b) Prioritize the use existing ROWs, wherever feasible.</li> <li>c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.</li> <li>d) Review capacities of available urban infrastructure and augment capacities as</li> </ul>	<b>No mitigation applies.</b> No housing is currently located on the Project Site, and no housing would be displaced as a result of the Project. Thus, application of this mitigation measure to the Project is not required.

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).</p> <p>e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.</p>	
<b>Fire Services (PSF)</b>		
<p><b>PSF-1:</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.</p>	<p><b>PMM PSP-1.</b> See below.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM PSP-1 below.</p> <p>The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. The Project would be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, LAMC, and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. In addition, the City requires that plans for building construction, fire flow requirements, fire protection devices (e.g. sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project would not result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD, such that it would require the construction of a new fire station. Thus, application of this mitigation measure to the Project is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
<b>Police Services (PSP)</b>		
<p><b>PSP-1:</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, 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.</p>	<p><b>PMM PSP-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description.</li> <li>• Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts.</li> <li>• Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or</li> </ul>	<p><b>No mitigation applies.</b> The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces designed to reduce opportunity crime and ensure safety and security. Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the Los Angeles Police Department’s (LAPD) capability to serve the Project Site. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Thus, application of this mitigation measure to the Project is not required.</p>

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	as pedestrians must be given equal consideration when developing a traffic control plan.	
<b>Schools (PSS)</b>		
<p><b>PSS-1:</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered educational facilities, need for new or physically altered educational facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.</p>	<p><b>PMM PSS-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</p>	<p>The Project would <b>substantially conform</b> to this mitigation measure due to its compliance with existing regulatory requirements. Specifically, payment of required school fees to LAUSD is required by law and is considered full mitigation of all impacts to schools pursuant to SB 50 and California Government Code Section 65995. Therefore, pursuant to existing regulatory requirements, the Project would be consistent with this mitigation measure.</p>
<b>Library Services (PSL)</b>		
<p><b>PSL-1:</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.</p>	<p><b>PMM PSL-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.</p>	<p><b>No mitigation applies.</b> The Project Site is located in an urbanized area of the city that is already served by several existing libraries, including: Mar Vista Branch Library, Lloyd Taber-Marina del Rey Library, and Playa Vista Branch Library. While the Project’s residential population could result in an increased demand for library services, the Project would not create the need for new or altered library facilities. Thus, incorporation of this mitigation measure is not required.</p>



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<b>Recreation (REC)</b>		
<p><b>REC-1:</b> Potential to 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.</p>	<p><b>PMM REC-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.</li> <li>b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: <ul style="list-style-type: none"> <li>i. Increasing the accessibility to natural areas for outdoor recreation</li> <li>ii. Utilizing “green” development techniques</li> <li>iii. Promoting water-efficient land use and development</li> </ul> </li> </ul>	<p><b>No mitigation applies.</b> Several existing parks are located in the Project Site area. Additionally, the Project includes open space and recreational facilities in accordance with the LAMC. Further, in accordance with Ordinance No. 184,505, the Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project’s demand for parks and recreational facilities. Through compliance with City requirements, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Thus, incorporation of this mitigation measure is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	
<p><b>REC-2:</b> Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>	PMM REC-1, PMM AQ-2, and PMM NOISE-1. See above.	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.</p>
<b>Transportation, Traffic, and Safety (TRA)</b>		
<p><b>TRA-1:</b> Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.</p>	No mitigation required.	<p><b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><b>TRA-2:</b> Conflict or be inconsistent with CEQA Guidelines section 15064.3(b).</p>	<p><b>PMM TRA-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>No mitigation applies.</b> A Vehicle Miles Traveled (VMT) analysis was conducted for the Project as part of the Transportation Assessment, prepared by Gibson Transportation Consulting, Inc., dated October 2022 (Appendix K). The Project's VMT impacts were assessed, based on the Los Angeles Department of Transportation's (LADOT) VMT Calculator tool. The Project Site is located in the West Los Angeles Area Planning Commission</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>• Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways:               <ul style="list-style-type: none"> <li>– include TDM mitigation requirements for new developments;</li> <li>– incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;</li> <li>– provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;</li> <li>– implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;</li> <li>– develop TDM-specific performance measures to evaluate project-specific and system-wide performance;</li> <li>– incorporate TDM performance measures in the decision-making process for identifying transportation investments;</li> </ul> </li> </ul>	<p>(APC) area, which has an average household VMT of 7.4 per capita. As discussed in the Transportation Assessment, the Project would have a daily household VMT of 6.9 per capita. Thus, the Project’s VMT would fall below LADOT’s threshold for the West Los Angeles APC. Furthermore, no potential significant impacts related to any other transportation-related issues have been identified, and no mitigation measures are required. Thus, application of this mitigation measure to the Project is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<ul style="list-style-type: none"> <li>– implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and</li> <li>– set aside funding for TDM initiatives.</li> <li>– The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.</li> </ul>	
<p><b>TRA-3:</b> Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).</p>	<p>No mitigation required.</p>	<p><b>No mitigation applies.</b> No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.</p>
<p><b>TRA-4:</b> Result in inadequate emergency access.</p>	<p><b>PMM TRA-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Prior to construction, project implementation agencies can and should ensure that all</p>	<p><b>No mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM TRA-2. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. During construction, the Project would include a Construction Traffic Management Plan (PDF-</p>

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	<p>necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:</p> <ul style="list-style-type: none"> <li>– Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.</li> <li>– Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.</li> <li>– Scheduling of truck trips outside of peak morning and evening commute hours.</li> <li>– Limiting of lane closures during peak hours to the extent possible.</li> <li>– Usage of haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>– Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.</li> <li>– Installation of traffic control devices as specified in the California Department of</li> </ul>	<p>TRANS-1), which would ensure that adequate emergency access exists during construction. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Also, prior to issuance of a building permit, the Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. Thus, application of this mitigation measure to the Project is not required.</p> <p><b>PDF TRANS-1:</b> Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to the Department of Transportation for review and approval. The CTMP shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The CTMP, including the Worksite Traffic Control Plan, shall be based on the nature and timing of specific construction activities and other projects in the</p>

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	<p>Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.</p> <ul style="list-style-type: none"> <li>– Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.</li> <li>– Storage of construction materials only in designated areas.</li> <li>– Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</li> <li>– Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.</li> <li>– Enhance emergency preparedness awareness among public agencies and with the public at large.</li> </ul>	<p>vicinity, and shall include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> <li>• Maintain access for land uses in the vicinity of the Project Site during construction;</li> <li>• Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;</li> <li>• Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;</li> <li>• Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized offsite staging area;</li> <li>• Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;</li> <li>• Prohibit construction worker or equipment parking on adjacent streets;</li> <li>• Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site’s driveways;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets to the extent feasible;</li> <li>• Contain construction activity within the Project Site boundaries;</li> <li>• Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;</li> <li>• Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project’s Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;</li> <li>• Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or</li> <li>• Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.</li> </ul>
<b>Tribal Cultural Resources (TCR)</b>		
<p><b>TCR-1:</b> Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is:</p>	<p>See <b>PMM CULT-1</b>.  <b>PMM TCR-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a</p>	<p><b>Mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with MM TCR-1,</p>

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<p>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</p> <p>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.</p>	<p>project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;</p> <p>b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;</p> <p>c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.</p>	<p>which is equal to or more effective than PMM TCR-1.</p> <p>The City has determined that MM TCR-1 shall be incorporated into the Project, which are tailored to specifically address potential Project-specific impacts. With implementation of these mitigation measures, potential impacts resulting from the inadvertent discovery of tribal cultural resources will be less than significant.</p> <p><b>MM TCR-1:</b> Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain qualified tribal monitors/consultants from the Gabrielino Tongva Indians of California Tribal Council. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, pavement removal, grubbing, tree removals, boring or a similar activity at the project site.</p> <p>The tribal monitors/consultants shall observe all ground disturbance activities on the project site at all times any ground disturbance activities are taking place that could have an impact on tribal cultural resources. The on-site tribal monitoring shall end when the ground disturbing activities are completed, or the frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist in consultation with the Tribe and the City.</p> <p>In the event that any subsurface objects or artifacts that may be tribal cultural resources are</p>



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		<p>encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the archaeologist, in consultation with the tribal monitor/consultant approved by the Gabrielino Tongva Indians of California Tribal Council, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:</p> <ol style="list-style-type: none"> <li>1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the immediate vicinity of the find until the find can be assessed by the archaeologist and tribal monitor/consultant.</li> <li>2. If the archaeologist and tribal monitor/consultant determine the resources are Native American in origin, the Tribe shall coordinate with the City regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes.</li> <li>3. The Applicant, or its successor, shall implement the tribe’s recommendations if the archaeologist, in consultation with the tribal monitor/consultant, reasonably conclude that the tribe’s recommendations are reasonable and feasible.</li> <li>4. In addition to any recommendations from the Tribe, the archaeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal</li> </ol>

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		<p>cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation. Any discrepancies between the implementation of the recommendations shall be resolved through the City as the Lead Agency, in consultation with the archaeologist and tribal monitor/consultant.</p> <ol style="list-style-type: none"> <li>5. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the archaeologist and tribal monitor/consultant and determined to be reasonable and appropriate.</li> <li>6. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 4 above.</li> <li>7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American</li> </ol>

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		<p>Heritage Commission for inclusion in its Sacred Lands File.</p> <p>8. Notwithstanding paragraph 7 above, any information that the Department of City Planning, in consultation with the City Attorney’s Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, Section 6254(r), and handled in compliance with the City’s AB 52 Confidentiality Protocols.</p> <p>9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.</p>
<b>Solid Waste (USSW)</b>		
<p><b>USSW-1:</b> 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.</p> <p><b>USSW-2:</b> Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.</p>	<p><b>PMM USSW-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p>	<p><b>No mitigation applies.</b> The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM USSW-2. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3)</p>

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	<ul style="list-style-type: none"> <li>a) Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities.</li> <li>b) Inclusion of a waste management plan that promotes maximum C&amp;D diversion.</li> <li>c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).</li> <li>d) Reuse of existing structure and shell in renovation projects.</li> <li>e) Development of indoor recycling program and space.</li> <li>f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.</li> <li>g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project.</li> </ul>	<p>environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countrywide Integrated Waste Management Plan (CoIWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the CoIWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent CoIWMP (the 2020 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.<sup>14</sup> The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.<sup>15</sup> The City also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) in 2006, which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting</p>

<sup>14</sup> County of Los Angeles Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, October 2021, p. 46.

<sup>15</sup> LASAN, Recycling, 2022, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrlstate=auguwldg\\_5&\\_afLoop=10870014375826670#!](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrlstate=auguwldg_5&_afLoop=10870014375826670#!), accessed September 22, 2022.

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	<p>Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.</p> <p>h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.</p> <p>i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.</p> <p>j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.</p> <p>k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</p> <p>l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.</p> <p>m) Provide education and publicity about reducing waste and available recycling services.</p>	<p>the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through established City recycling programs, and would also be subject to the City’s Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects. In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&amp;D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&amp;D waste generated within City limits to be taken to City-certified C&amp;D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project’s waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure. Project construction waste would be hauled by permitted haulers and taken only to City-certified C&amp;D processing facilities that are monitored for compliance with existing regulations. Project-generated C&amp;D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City’s Zero Waste Plan goal of achieving a 90 percent solid waste diversion rate by 2025. Thus, application of</p>

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	<p>n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.</p>	<p>this mitigation measure to the Project is not required.</p>
<b>Wastewater (USWW)</b>		
<p><b>USWW-1:</b> Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects.</p>	<p><b>PMM HYD-1.</b> See above.  <b>PMM USWW-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project’s</li> </ul>	<p><b>No mitigation applies.</b> The analysis of the Project’s potential impacts related to wastewater treatment in Chapter 5, <i>Initial Study and Environmental Analysis</i>, concluded that the Project’s estimated wastewater generation of approximately 17,557 gallons per day could be accommodated by the existing remaining daily treatment capacity of the Hyperion Treatment Plant. Additionally, the Project would be required to comply with the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. The Project would not require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects. No significant impacts related to these issues have been identified, and no mitigation</p>

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	CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	measures are required. Thus, incorporation of this mitigation measure is not required.
<b>USWW-2:</b> 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.	<b>PMM USWW-1.</b> See above.	<b>No mitigation applies.</b> See discussion of the applicability of PMM USWW-1 above.
<b>Water Supply (USWS)</b>		
<b>USWS-1:</b> Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.	<b>PMM USWS-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median	<b>No mitigation applies.</b> The Project would connect to the existing 8-inch water main located approximately 37 feet from the Project Site on the west side of Del Rey Avenue. As discussed in Chapter 5, <i>Initial Study and Environmental Analysis</i> , the Project would consume approximately 17,557 gallons of water per day. 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 Year, a Single Dry Year, and Multiple Dry Years. As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP. Therefore, the City would not require new water infrastructure or supply to meet the demand from the Project. Thus, application of this mitigation measure to the Project is not required.

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	<p>landscaping and hillside landscaping can and should be implemented where feasible.</p> <p>c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</p> <p>d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.</p>	
<p><b>USWS-2:</b> Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.</p>	<p><b>PMM USWS-1.</b> See above.</p>	<p><b>No mitigation applies.</b> See discussion of the applicability of PMM USWS-1 above.</p>
<b>Wildfire (WF)</b>		
<p><b>WF-1:</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.</p>	<p><b>PMM WF-1:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and</p>	<p><b>No mitigation applies.</b> The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.</p>



Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.</p> <p>b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.</p> <p>c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.</p> <p>d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.</p> <p>e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.</p> <p>f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.</p>	
<p><b>WF-2:</b> Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.</p>	<p><b>PMM HAZ-4.</b> See above.</p> <p><b>PMM WF-2:</b> In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p><b>No mitigation applies.</b> The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.</p>

Significance Thresholds and Project Impacts	SCAG Connect SoCal 2020 Project – Level Mitigation Measures (Implemented by Lead Agency)	Applicability to the Project
	<p>a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to</p> <ul style="list-style-type: none"> <li>– Submit a fire protection plan including the designation of fire watch staff;</li> <li>– Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;</li> <li>– Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and</li> <li>– Designate trained fire watch staff during project construction to reduce risk of fire hazards.</li> </ul>	
<p><b>WF-3:</b> Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.</p>	<p>PMM WF-1, PMM WF-2, PMM HYD-1, and PMM HAZ-4. See above.</p>	<p><b>No mitigation applies.</b> The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.</p>

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# Chapter 5

## Initial Study and Environmental Analysis

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

<b>LEAD CITY AGENCY:</b> City of Los Angeles, Department of City Planning		<b>COUNCIL DISTRICT:</b> CD 11 – Traci Park	<b>DATE:</b> June 2023
<b>RESPONSIBLE AGENCIES:</b> South Coast Air Quality Management District, Los Angeles Building and Safety Department, Los Angeles Department of Public Works			
<b>PROJECT TITLE:</b> 4112 Del Rey Avenue Project	<b>ENVIRONMENTAL CASE:</b> ENV-2022-9017-SCEA	<b>CASE NOS:</b> DIR-2022-9016-DB-SPR-VHCA	
<b>PREVIOUS ACTIONS CASE NO.</b> No recent activity		<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	
<b>PROJECT LOCATION:</b> 4112, 4120, 4130, 4132, 4134, and 4136 Del Rey Avenue, Los Angeles, CA 90292			
<b>PROJECT DESCRIPTION</b> The Project proposes the development of a new, six-story (66-foot-tall) mid-rise building consisting of 210 residential units, including 33 studio units, 108 one-bedroom units, 53 two-bedroom units, and 16 three-bedroom units and 33,793 square feet of open space. Of these units, 18 units (11 percent of the base density) would be designated as Very Low Income (VLI) units. The Project would also include a five-story parking structure containing 282 vehicular parking spaces that would be wrapped by the residential building. The Project would include 253,974 square feet of floor area resulting in a floor area ratio (FAR) of 2.06:1.			
<b>COMMUNITY PLAN AREA:</b> Palms – Mar Vista – Del Rey		<b>AREA PLANNING COMMISSION:</b> West Los Angeles	<b>CERTIFIED NEIGHBORHOOD COUNCIL:</b> Del Rey
<b>STATUS:</b> <input type="checkbox"/> Preliminary <input checked="" type="checkbox"/> Does Conform to Plan <input checked="" type="checkbox"/> Proposed <input type="checkbox"/> Does NOT Conform to Plan <input type="checkbox"/> Adopted in			
<b>EXISTING ZONING:</b> CM(GM)-2D-CA	<b>MAX. DENSITY ZONING:</b> 1 du/800 sf	<b>LA River Adjacent:</b> No	
<b>GENERAL PLAN LAND USE:</b> Light Manufacturing	<b>MAX. DENSITY PLAN:</b>	<b>PROPOSED PROJECT DENSITY:</b> 2.06:1 FAR; 210 dwelling units	

**DETERMINATION (To be completed by Lead Agency)**

**On the basis of this initial evaluation:**

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified “residential or mixed use residential project” that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because the SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

# I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Senate Bill (SB) 743 [Public Resources Code (PRC) Section 21099(d)] sets forth new guidelines for evaluating project transportation impacts under the California Environmental Quality Act (CEQA), as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within one-half mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way (ROW) from, parcels that

are developed with qualified urban uses. The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the L.A. CEQA Threshold Guide (2006) shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”<sup>1</sup>

As shown in Chapter 2, *Project Description*, and Chapter 3, *SCEA Criteria and TPP Consistency Analysis*, the Project is a residential development on an infill site within a TPA and therefore, SB 743 applies to the Project and the Project’s potential aesthetic effects shall not be considered significant environmental impacts. The analysis presented in this aesthetics section is for informational purposes only.

**a. Have a substantial adverse effect on a scenic vista?**

**No Impact.** A scenic vista is a panoramic view of a valued visual resource. Scenic vistas generally include public views that provide visual access to large panoramic views of natural features, unusual terrain, or unique urban or historic features. A scenic vista field of view can be wide and extend into the distance, and include focal views that focus on a particular object, scene, or feature of interest for the benefit of the general public. The Project Site is located within the highly urbanized Palms – Mar Vista – Del Rey Community Plan (Community Plan) area in the City of Los Angeles (City).

The Project Site is located in a highly urbanized area of the City, which is developed with a mix of commercial and residential uses. Views in the vicinity of the Project Site and/or that include the Project Site are limited to those of existing development. Any views that might be considered scenic (such as those of mountain ranges, the ocean, or Downtown skyline) are not readily available from the Project Site area due to distance and intervening development. As such, proposed development of the Project Site would not have a substantial adverse effect on a scenic vista. Moreover, pursuant to PRC Section 21099, the Project’s aesthetics impacts would not be considered significant. No mitigation measures would be required.

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

**No Impact.** The Project Site is not located within a State-designated Scenic Highway. The nearest eligible state scenic highway is along California State Route 1, approximately 0.7 mile northwest of the Project Site.<sup>2</sup> As such, development of the Project would not substantially damage scenic resources. Moreover, pursuant to PRC Section 21099, the

<sup>1</sup> City of Los Angeles Department of City Planning, ZI No. 2452 Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

<sup>2</sup> California Department of Transportation, California State Scenic Highway System Map, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed August 24, 2022.

Project's aesthetics impacts would not be considered significant. No mitigation measures would be required.

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

**No Impact.** The Project would replace the Project Site's existing low-rise commercial uses with a residential development. The proposed structure would be a six-story mid-rise building reaching approximately 66 feet in height, and would consist of 210 residential units and 33,973 square feet of open space. The Project would also include a five-story parking structure that would be wrapped by the residential building. The Project Site is located within a highly urbanized area within the Community Plan and is bordered by existing low- and mid-rise commercial and residential uses.

As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, the Project Site is zoned CM(GM)-2D-CA (Commercial Manufacturing within the Glencoe/Maxella Specific Plan [Specific Plan], Height District 2 with Development Limitation, Commercial and Artcraft District). The CM(GM) designation permits residential uses as allowed in the Multiple Dwelling (R3) Zone.<sup>3</sup> The 2D designation indicates required compliance with the density and height regulations set forth in Specific Plan Sections 6.D and 6.E, including a residential density limit of 1 dwelling unit per 800 square feet of lot area, an FAR limit of 1.75:1, and a height limit of 55 feet subject to certain setback requirements.<sup>4</sup> The CA designation indicates that the Project Site is located within a commercial and artcraft district where artcraft activities, combined with commercial and residential uses are permitted.

The Project proposes to set aside 18 units (or 11 percent of the Project Site's base density) for VLI households and utilize the provisions of Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and State density bonus law to achieve a density bonus increase of 35 percent as well as two on-menu incentives/concessions to allow a 35 percent increase in FAR as well as a one-story/11-foot increase in height .

With regard to the City's regulations governing scenic quality, local land use plans applicable to the Project include the Community Plan. Objective 2-3 of the Community Plan aims to enhance the visual appearance and appeal of commercial districts, with related Policies 2-.3.1 and 2-3.2 to require new development to be compatible with adjacent development, community character, and scale, and to improve commercial areas and street identity and character through appropriate sign control, landscaping, and streetscape. The Project would be consistent with this objective and policies from the

<sup>3</sup> Specific Plan Section 6.A.1.

<sup>4</sup> Specific Plan Section 5.B.



Community Plan as the Project would replace the six existing one-story creative office/warehouse buildings with a new, modern style six-story residential building, which would enhance the appearance of the Project area compared to existing conditions. Moreover, the massing, height, and setbacks of the Project would comply with those allowed under the Specific Plan as well as the provisions of State density bonus law. Furthermore, the Project would be required to undergo Site Plan Review to ensure consistency with all applicable City development standards.

Based on the above, with the approval of the requested density bonus, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be considered significant.. No mitigation measures would be required.

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

**No Impact.** A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

***Construction***

Project construction may involve temporary glare impacts as a result of construction equipment and materials. It is expected that construction activities for the Project would occur primarily during daylight hours and that construction-related illumination in the nighttime would be used for safety and security purposes only, in compliance with LAMC requirements. In addition, construction lighting would only last as long as needed during the finite construction process. Construction activities would not require the use of large, flat, and shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, Project construction would not result in adverse lighting and glare effects. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant. No mitigation measures would be required.

***Operations***

The Project would increase lighting at the Project Site compared to existing conditions. The Project Site is in an urbanized area and is surrounding by existing commercial and residential uses. However, proposed lighting for the Project would be similar to that of the existing surrounding community. The Project would include interior and exterior lighting that complies with the LAMC provision that requires minimizing the effect of the new

sources of lighting. Specifically, LAMC Section 91.0117 requires that no exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. The Project's exterior building materials are anticipated to include plaster, fiber cement panel, wood simulated texture, and glass and metal railings, among others. If not properly treated, these materials could result in increased daytime glare. However, the Project would be subject to the City's required Site Plan Review process to ensure compliance with applicable development requirements. Accordingly, Project operation would not result in adverse lighting and glare effects. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant. No mitigation measures would be required.

### **Cumulative Impacts**

There are 11 related projects in the vicinity of the Project Site (refer to Table 3 on page 30 of the *Transportation Assessment* prepared for the Project, included in Appendix K). Four of the related projects (Projects 1, 2, 3, and 7) are transit-priority projects in designated transit-priority areas and similar to the Project, pursuant to PRC Section 21099 aesthetics (and parking) impacts associated with these related projects would not be significant. The other four related projects include infill development in highly urbanized areas. None of these related projects shares scenic resources in common with the Project. Additionally, none of these related projects is visible from a scenic highway. The degree to which these related projects would comply with regulations governing scenic quality would be considered on a project-by-project basis by their respective lead agencies, and the related projects would be required to comply with applicable design standards as enforced by the lead agencies. Because the related projects are infill development in a highly urbanized area, the potential increase in light and glare would be negligible, as the related projects would replace existing uses with existing sources of light and glare and would be required to comply with existing regulations related to lighting and low-glare building materials. No significant cumulative aesthetics impacts would occur.

## **II. Agriculture and Forestry Resources**

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

	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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.** The Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. No agricultural uses or related operations are present on the Project Site or in the surrounding urbanized area. Furthermore, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.<sup>5</sup> Since the Project

<sup>5</sup> California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed August 12, 2022.

would not convert farmland to non-agricultural uses, there would be no impacts. No mitigation measures would be required.

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

**No Impact.** Per the City’s ZIMAS website, the Project Site is designated for Light Manufacturing land use. The Project Site is zoned CM(GM)-2D-CA (Commercial Manufacturing within the Glencoe/Maxella Specific Plan Zone, Height District 2 with D Limitation, Commercial and Artcraft District). No agricultural zoning designations are present in the Project vicinity,<sup>6,7,8</sup> and no nearby lands are enrolled under the Williamson Act.<sup>9</sup> As such, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract, and there would be no impact. No mitigation measures would be required.

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

**No Impact.** As discussed in the response to Checklist Question II.b, the Project Site’s zoning designation is CM(GM)-2D-CA, which is a commercial zone. The Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking and does not contain any forest land or timberland. Furthermore, the Project vicinity is urbanized and zoned primarily for commercial, residential, and industrial uses. There is no forest land, timberland, or land zoned for timberland production in the surrounding area.<sup>10</sup> As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impacts. No mitigation measures would be required.

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

**No Impact.** As previously discussed, the Project Site consists of six buildings occupied by creative office and warehouse uses and associated surface-level parking surrounded by urban development. No forest land exists on the Project Site or in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land

<sup>6</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>7</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>8</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>9</sup> APNs 4123-004-010 and 4123-004-011, <http://zimas.lacity.org/>, accessed July 12, 2022.

<sup>9</sup> California Department of Conservation, The Williamson Act Status Report 2016–17, [www.conservation.ca.gov/dlrp/wa/Documents/stats\\_reports/2018%20WA%20Status%20Report.pdf](http://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2018%20WA%20Status%20Report.pdf), accessed December 26, 2022.

<sup>10</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

to non-forest use. There would be no impacts and no mitigation measures would be required.

**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.** As previously discussed, there are no agricultural uses or related operations on or near the Project Site. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur and no mitigation measures would be required.

**Cumulative Impacts**

The 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K) are located in highly urban areas. Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

**III. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis is based on the information provided in the Project-specific air quality emissions modeling worksheets contained in Appendix A, as well as the Project-specific transportation assessment contained in Appendix K, of this SCEA.

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

**Less Than Significant Impact.** The Project Site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of SCAQMD, and the air quality plan applicable to the Project Site is SCAQMD's 2016 Air Quality Management Plan (AQMP). The Southern California Association of Governments (SCAG) prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized by SCAQMD in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.

**2016 AQMP**

The 2016 AQMP was adopted by SCAQMD and approved by the CARB as a regional plan to develop and implement emissions reduction strategies to lead the Basin into compliance with criteria pollutant standards and other federal requirements. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, State, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from air quality co-benefits for greenhouse gas (GHG) reduction plans, energy, transportation, and other planning efforts. The strategies included in the 2016 AQMP are intended to demonstrate attainment of the National Ambient Air Quality Standards (NAAQS) for the federal ozone (O<sub>3</sub>) and fine particulate matter (2.5 microns or smaller in diameter, PM<sub>2.5</sub>) standards.

In accordance with the SCAQMD CEQA Air Quality Handbook, the following criteria are required to be addressed to determine the Project's consistency with the current AQMP: (1) whether the Project will result in 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 emissions reductions specified in the AQMP, and (2) whether the Project will exceed the economic and demographic assumptions utilized in preparing the AQMP.

*Criterion No. 1*

As discussed below and consistent with the first criterion, the Project would not conflict with the ability of federal, State, and local agencies to implement fair-share emissions strategies or achieve compliance with criteria pollutant standards or other federal requirements. Specifically, the Project's nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), PM<sub>10</sub>, and PM<sub>2.5</sub> emissions resulting from construction and operation were analyzed to ascertain any potential effects on localized concentrations and determine if there is a

potential for such emissions to cause or effect a violation of the ambient air quality standards for nitrogen dioxide (NO<sub>2</sub>), CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. As discussed under Threshold (b) and Threshold (c), emissions would not exceed the SCAQMD's regional mass emissions thresholds or the localized significance thresholds (LSTs) nor would an intersection result in a CO hotspot in excess of the ambient air quality standards as a result of post-construction motor vehicle operations. The Project's emissions would therefore not increase concentrations of criteria pollutants or their precursors in a manner that could obstruct SCAQMD's efforts to achieve attainment of ambient air quality standards for any criteria pollutant for which it is currently not in attainment or jeopardize the current attainment status of the Basin for other criteria pollutants. Therefore, in response to Criterion 1, the Project would not result in 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 emissions reductions specified in the AQMP.

### *Criterion No. 2*

Regarding the second criterion for determining consistency with AQMP growth assumptions, and as noted above, the 2016 AQMP emissions forecasts are based upon economic and demographic growth projections provided in the 2016-2040 RTP/SCS.<sup>11</sup> As discussed below, the Project would incorporate appropriate emission control strategies set forth in the 2016 AQMP aimed at achieving its emission reduction goals and would be consistent with the demographic and economic assumptions upon which the plan is based. The sections that follow provide additional discussion regarding the consistency of the Project with the AQMP as well as the growth projections provided in the 2016-2040 RTP/SCS.

### *Growth Projections*

With respect to demographic and economic projections, the Project would generate short-term construction jobs, but these jobs would not necessarily bring new construction workers or their families into the region since construction workers are typically drawn from an existing regional pool of construction workers who travel among construction sites within the region as individual projects are completed, and are not typically brought from other regions to work on developments such as the Project. Moreover, these jobs would be relatively small in number and temporary in nature. Thus, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based.

Furthermore, as discussed in response to Checklist Question XIV.a, long-term operation of the Project would result in an estimated residential population of approximately 473 residents, which would be an approximate 0.01 percent increase from the existing City population. As discussed therein, the Project's population increase would be within SCAG's population forecasts. The Project does not include commercial uses or

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<sup>11</sup> Since the 2016 AQMP is based on the 2016-2040 RTP/SCS, Connect SoCal 2020 is not utilized in this analysis.

associated commercial employees; only a de minimis number of people would administer the Project's leasing office and provide occasional building maintenance services. These employees are expected to be drawn from the regional labor pool and, therefore, employment growth associated with operations of the Project is expected to be minimal and consistent with the long-term population and employment projections utilized in the development of the 2016 AQMP.

### *Emission Control Measures*

Control strategies in the AQMP, applicable to temporary emissions from construction activities, include MOB-08 and MOB-10 (as denoted in the 2016 AQMP),<sup>12</sup> which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards. In accordance with such strategies, the Project is also required to utilize construction contractors in compliance with State on-road and off-road rules, including the CARB Air Toxics Control Measure (ATCM) that limits heavy-duty diesel motor vehicle idling to no more than 5 minutes at any location (Title 13 California Code of Regulations [CCR], Section 2485), the Truck and Bus regulation that reduces NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). Under the In-Use Off-Road Diesel Vehicle Regulation, construction equipment fleet operators are required to replace higher emitting models with lower emitting models based on a phased-in schedule with full compliance by 2023 for large and medium fleets (fleets with greater than 5,000 total equipment horsepower or with 2,501 to 5,000 horsepower, respectively) and by 2028 for small fleets (fleets with 2,500 or less total equipment horsepower). The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 and Rule 1113 for controlling volatile organic compound (VOC) emissions from architectural coatings. Compliance with these requirements meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed in Chapter 2, *Project Description*, and Chapter 3, *SCEA Criteria and TPP Consistency Analysis*, the Project Site is located within a designated TPA as well as an HQTAs, and several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site.

<sup>12</sup> AQMP measures ONRD-04 (2012 AQMP) and MOB-08 (2016 AQMP) apply to on-road mobile sources and are the accelerated retirement of older on-road heavy-duty vehicles to reduce emissions of NO<sub>x</sub> and particulate matter. AQMP measures OFFRD-01 (2012 AQMP) and MOB-10 (2016 AQMP) apply to off-road mobile sources and are the extension of the Surplus Off-Road Opt-In for NO<sub>x</sub> (SOON) provision for construction/industrial equipment to encourage the accelerated retirement of older off-road heavy-duty equipment to reduce emissions of NO<sub>x</sub>.



The Project Site's location, and the Project's design and land uses, would ensure the Project would not conflict with the AQMP. The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, the Project Site's urban infill location and the Project's mixed-use design and land uses would increase the density at the Project Site and would support measures related to reducing vehicle trips for residents, patrons, and employees by increasing residential and commercial density near public transit. The Project would also provide 142 bicycle parking spaces and would comply with the City's requirements for providing electric vehicle infrastructure which would encourage non-fossil fuel dependent commuting.

The Project Site is served by a network of regional buses providing connectivity to the larger metropolitan area. The Project would not conflict with the ability of federal, State, and local agencies to implement fair-share emissions strategies. The Project would also not conflict with goals to reduce vehicle miles traveled (VMT) and associated vehicles emissions.

### ***City's General Plan Air Quality Element***

In addition to the Project's consistency with the 2016 AQMP and 2016-2040 RTP/SCS, the Project would be consistent with the Air Quality Element of the City's General Plan, which includes Citywide policies regarding a range of City resources and services, some of which are relevant to air quality. The Project's consistency with the applicable air quality goals, objectives, and policies in the Air Quality Element of the General Plan is evaluated and shown in **Table 5-1, Comparison of the Project to Applicable Goals and Policies of the Air Quality Element of the City of Los Angeles General Plan**. As discussed in the table, the Project construction and operations would not conflict with or be inconsistent with applicable air quality policies of the General Plan.

**TABLE 5-1**  
**COMPARISON OF THE PROJECT TO APPLICABLE GOALS AND POLICIES OF THE AIR QUALITY**  
**ELEMENT OF THE CITY OF LOS ANGELES GENERAL PLAN**

Recommendation	Analysis of Project Consistency
<b>Air Quality Element</b>	
<p><b>Goal 1:</b> Good air quality and mobility in an environment of continued population growth and healthy economic structure.</p>	<p><b>Consistent.</b> The Project would be consistent with SCAG goals and objectives under SB 375 to implement “smart growth.” The Project would provide residential uses in close proximity to job centers in Los Angeles where people can live and work and have access to convenient modes of transportation that provides options for reducing reliance on automobiles and minimizing associated air pollutant emissions. The Project would meet the applicable requirements of the State of California Building Standards Code and the City of Los Angeles Green Building Code. The Project would also reduce VMT as a result of its urban infill location in a TPA and a dense mixed-use area. The Project would add new infill residential units, with convenient access to public transit, which would allow people to live near work and recreational amenities. As a result, the Project would provide people with convenient mobility options and a wide range of economic/employment opportunities.</p>
<p><b>Objective 1.1:</b> It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.</p>	<p><b>Consistent.</b> The Project’s land use characteristics and project design features would reduce emissions associated with energy and transportation. As discussed above, the Project would be consistent with the SCAG growth projections that are used in preparing the AQMP. The Project would occupy a location that is highly accessible by regional and local bus lines. As such, the Project would be supportive of the Transportation Control Measures in the AQMP related to reducing vehicle trips for residents and visitors. The Project would provide infill residential uses, which would allow people to live near work and recreational amenities.</p>

Recommendation	Analysis of Project Consistency
<p><b>Objective 1.3:</b> It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.</p>	<p><b>Consistent.</b> The Project would incorporate measures that would reduce particulate air pollutants from unpaved areas, parking lots, and construction sites. The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403. The Project would also comply with the applicable provisions of the CARB ATCM regarding idling limitations for diesel trucks reducing exhaust diesel particulate matter (DPM) emissions. Project construction would comply with the applicable provisions of the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of DPM filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Project construction would also comply with the applicable provisions of the CARB Truck and Bus regulation to reduce particulate matter and NO<sub>x</sub> emissions from existing diesel trucks.</p>
<p><b>Policy 1.3.1:</b> Minimize particulate emissions from construction sites.</p>	<p><b>Consistent.</b> The Project would incorporate measures that would reduce particulate air pollutants from construction activity as described above under Objective 1.3.</p>
<p><b>Policy 1.3.2:</b> Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.</p>	<p><b>Consistent.</b> The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions from unpaved roads and parking lots associated with construction-related vehicular traffic.</p>
<p><b>Goal 2:</b> Less reliance on single-occupant vehicles with fewer commute and non-work trips.</p>	<p><b>Consistent.</b> The Project's land use characteristics would reduce trips and VMT due to its urban infill location in a dense mixed-use area that includes nearby housing, employment, commercial and service uses with nearby access to multiple nearby public transportation routes.</p>
<p><b>Objective 2.1:</b> It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.</p>	<p><b>Consistent.</b> The Project is located within close proximity of existing public transportation, including existing regional and local Metro bus lines. The Project would locate infill residential land uses in an area with access to multiple other destinations, including job centers, and commercial uses. These features would reduce trips and encourage residents to utilize alternative modes of transportation.</p>
<p><b>Objective 2.2:</b> It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.</p>	<p><b>Consistent.</b> The Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 California Green Building Standards (CALGreen) Code. In addition, the Project's location would encourage non-automotive transportation to and from the Project Site. The Project would be located within close proximity to existing public transportation and would provide on-site bicycle parking for building residents and visitors.</p>

Recommendation	Analysis of Project Consistency
<p><b>Policy 2.2.1:</b> Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.</p>	<p><b>Consistent.</b> The Project's location would encourage non-automotive transportation to and from the Project Site. The Project would be located within close proximity of public transportation. The Project would provide 142 bicycle parking spaces for residents and visitors.</p>
<p><b>Policy 2.2.2:</b> Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.</p>	<p><b>Consistent.</b> The Project would include bicycle parking in accordance with LAMC Section 12.21.A.16.</p>
<p><b>Goal 4:</b> Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.</p>	<p><b>Consistent.</b> The Project's characteristics would reduce trips and VMT due to its infill location, ready access to public transportation, close proximity to multiple other destinations including job centers, commercial uses, and services, and is pedestrian and bicycle-friendly.</p>
<p><b>Objective 4.1:</b> It is the objective of the City of Los Angeles to include the regional attainment of ambient air quality standards as a primary consideration in land use planning.</p>	<p><b>Consistent.</b> The Project analysis of potential air quality impacts relied upon the significance thresholds adopted by SCAQMD, which considers attainment of the ambient air quality standards. The Project also incorporates land use characteristics that would reduce air pollutant emissions. The Project operational impacts would be less than significant and would not cause or contribute to an exceedance of the ambient air quality standards.</p>
<p><b>Policy 4.1.2:</b> Ensure that project level review and approval of land use development remain at the local level.</p>	<p><b>Consistent.</b> The Project environmental review and approval would occur at the local level.</p>
<p><b>Policy 4.2.2:</b> Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.</p>	<p><b>Consistent.</b> The Project would provide new residential land uses in an infill location within close proximity to public transportation. The Project is located an urban area surrounded by commercial, residential, restaurant, office, and service uses.</p>
<p><b>Policy 4.2.3:</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>	<p><b>Consistent.</b> The Project is proposed on an infill location and would incorporate pedestrian pathways that would connect to the existing sidewalk network. The Applicant would include EV parking capacity for up to 115 parking spaces. The Project would provide 142 bicycle parking spaces in compliance with LAMC requirements.</p> <p>The Project would improve pedestrian circulation and the pedestrian environment with the inclusion of a ground level outdoor patio, ground level commercial uses, inclusion a roof deck with swimming pool and fireplace/firepits, perimeter landscaping.</p> <p>Therefore, the Project would provide services for and would be compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.</p>
<p><b>Policy 4.2.4:</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects.</p>	<p><b>Consistent.</b> The Project environmental review and potential approval include an analysis of air quality impacts.</p>

Recommendation	Analysis of Project Consistency
<p><b>Policy 4.2.5:</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.</p>	<p><b>Consistent.</b> The Project is proposed on an infill site that would be located within a quarter-mile of existing public transportation. The Project would provide 142 bicycle parking spaces in compliance with LAMC requirements.</p>
<p><b>Goal 5:</b> Energy efficiency through land use and transportation planning, the use of renewable resources and less polluting fuels, and the implementation of conservation measures, including passive methods such as site orientation and tree planting.</p>	<p><b>Consistent.</b> The Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code. The Project would incorporate sustainability measures and performance standards including implementing a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. The Project would include a total of 53 new trees, including forty-eight trees on level one and 5 on the roof top deck.</p>
<p><b>Objective 5.1:</b> It is the objective of the City of Los Angeles to increase energy efficiency of City facilities and private developments.</p>	<p><b>Consistent.</b> As noted above, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code.</p>
<p><b>Policy 5.1.2:</b> Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.</p>	<p><b>Consistent.</b> As noted above, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code. The Applicant would include EV parking capacity for up to 115 parking spaces.</p>
<p><b>Policy 5.1.4:</b> Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.</p>	<p><b>Consistent.</b> The Project would implement a construction waste management plan to divert all mixed construction and demolition debris to City certified construction and demolition waste processors, consistent with the Los Angeles City Council approved Council File 09-3029. Municipal solid waste would be collected by haulers that comply with City and State waste diversion (specifically AB 1327) requirements, which may include mixed waste processing that yields diversion results comparable to source separation.</p>
<p><b>Objective 5.3:</b> It is the objective of the City of Los Angeles to reduce the use of polluting fuels in stationary sources.</p>	<p><b>Consistent.</b> As noted above, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code.</p>
<p><b>Policy 5.3.1:</b> Support the development and use of equipment powered by electric or low-emitting fuels.</p>	<p><b>Consistent.</b> As noted above, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code. The Applicant would include EV parking capacity for up to 115 parking spaces.</p>

SOURCE: ESA, 2022.

## Conclusion

The Project would not conflict with or obstruct the implementation of the air quality goals, objectives, and policies of the General Plan. Implementation of the Project would result in a less-than-significant impact. No mitigation measures would be required.

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

**Less than Significant Impact.** A significant impact may occur if a project were to make a cumulatively considerable contribution of a federal or State criteria pollutant for which the Basin is currently in non-attainment. The Basin is currently in non-attainment for O<sub>3</sub> (federal and State standards), respirable particulate matter (PM<sub>10</sub>) (State standards only) and fine particulate matter (PM<sub>2.5</sub>) (federal and state standards).

The SCAQMD Air Quality Handbook advises that for both construction and operational activities, if a project exceeds the identified project-level significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As discussed below, maximum daily net emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region.

In addition, as discussed under response to Checklist Question III.c, below, construction of the Project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a LST. Therefore, the emissions of non-attainment pollutants and precursors generated by the Project would be less than significant and would not result in a cumulatively considerable air quality impact.

In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

*“A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.”*

For purposes of the cumulative air quality analysis, with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the applicable AQMP. As discussed previously under response to Checklist Question III.a, the Project would not conflict with the AQMP and would not have a cumulatively considerable air quality impact.

The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less-than-significant impacts relative to the maximum daily emissions as compared to the SCAQMD regional significance thresholds for construction and operational phases for criteria air pollutant emissions in which the region is non-attainment under the California Ambient Air Quality Standards or NAAQS (i.e., O<sub>3</sub> precursors of [VOCs and NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>]). In addition, construction and operational emissions from the Project would not exceed the SCAQMD regional significance thresholds for attainment or maintenance criteria air pollutants (i.e., CO and sulfur dioxide [SO<sub>2</sub>]).

### **Criteria Pollutants**

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the United States Environmental Protection Agency (USEPA) and are subject to emissions control requirements adopted by federal, state and local regulatory agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Exposure to these criteria air pollutants at levels above applicable standards can lead to health effects, as summarized below.

**Ozone (O<sub>3</sub>):** O<sub>3</sub> is a secondary pollutant formed by the chemical reaction of VOCs and NO<sub>x</sub> in the presence of sunlight under favorable meteorological conditions, such as high temperature and stagnation episodes. O<sub>3</sub> concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. According to the USEPA, O<sub>3</sub> can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath.<sup>13</sup> O<sub>3</sub> can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways;

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<sup>13</sup> United States Environmental Protection Agency, 2022, Health Effects of Ozone Pollution, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>, last updated June 14, 2022, accessed October 28, 2022.

aggravate lung diseases such as asthma, emphysema and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic obstructive pulmonary disease.<sup>14</sup> Long-term exposure to O<sub>3</sub> is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of O<sub>3</sub> may also be linked to permanent lung damage, such as abnormal lung development in children.<sup>15</sup> According to the CARB, inhalation of O<sub>3</sub> causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to O<sub>3</sub> can reduce the volume of air that the lungs breathe in and cause shortness of breath.<sup>16</sup> The USEPA states that people most at risk from breathing air containing O<sub>3</sub> include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers.<sup>17</sup> Children are at greatest risk from exposure to O<sub>3</sub> because their lungs are still developing and they are more likely to be active outdoors when O<sub>3</sub> levels are high, which increases their exposure.<sup>18</sup> According to CARB, studies show that children are no more or less likely to suffer harmful effects than adults; however, children and teens may be more susceptible to O<sub>3</sub> and other pollutants because they spend nearly twice as much time outdoors and engaged in vigorous activities compared to adults.<sup>19</sup> Children breathe more rapidly than adults and inhale more pollution per pound of their body weight than adults and are less likely than adults to notice their own symptoms and avoid harmful exposures.<sup>20</sup> Further research may be able to better distinguish between health effects in children and adults.<sup>21</sup>

**Volatile Organic Compounds (VOCs):** VOCs are organic chemical compounds of carbon and are not “criteria” pollutants themselves; however, VOCs are a prime component (along with NO<sub>x</sub>) of the photochemical processes by which such criteria pollutants as O<sub>3</sub>, NO<sub>2</sub>, and certain fine particles are formed.<sup>22</sup> They are therefore regulated as “precursors” to formation of these criteria pollutants. Some are also identified as TACs and have adverse health effects. VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids, internal combustion associated with motor vehicle usage, and consumer products (e.g., architectural coatings, etc.).

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<sup>14</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution.

<sup>15</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution.

<sup>16</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>, accessed October 28, 2022.

<sup>17</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution, <https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution>, last updated June 14, 2022, accessed October 28, 2022.

<sup>18</sup> United States Environmental Protection Agency, Health Effects of Ozone Pollution.

<sup>19</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone, <https://ww2.arb.ca.gov/resources/ozone-and-health>, accessed October 28, 2022.

<sup>20</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone.

<sup>21</sup> California Air Resources Board, Ozone & Health, Health Effects of Ozone.

<sup>22</sup> United States Environmental Protection Agency, Technical Overview of Volatile Organic Compounds, <https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds>, last updated April 12, 2017, accessed October 28, 2022.



**Nitrogen Dioxide (NO<sub>2</sub>) and Nitrogen Oxides:** NO<sub>x</sub> is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include NO<sub>2</sub> and nitric oxide (NO). Ambient air quality standards have been promulgated for NO<sub>2</sub>, which is a reddish-brown, reactive gas.<sup>23</sup> The principal form of NO<sub>x</sub> produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO<sub>2</sub>, creating the mixture of NO and NO<sub>2</sub> referred to as NO<sub>x</sub>.<sup>24</sup> Major sources of NO<sub>x</sub> include emissions from cars, trucks and buses, power plants, and off-road equipment.<sup>25</sup> The terms NO<sub>x</sub> and NO<sub>2</sub> are sometimes used interchangeably. However, the term NO<sub>x</sub> is typically used when discussing emissions, usually from combustion-related activities, and the term NO<sub>2</sub> is typically used when discussing ambient air quality standards. Where NO<sub>x</sub> emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO<sub>x</sub> emissions would oxidize in the atmosphere to form NO<sub>2</sub>. According to the USEPA, short-term exposures to NO<sub>2</sub> can potentially aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms (such as coughing, wheezing or difficulty breathing), hospital admissions and visits to emergency rooms while longer exposures to elevated concentrations of NO<sub>2</sub> may contribute to the development of asthma and potentially increase susceptibility to respiratory infections.<sup>26</sup> According to CARB, controlled human exposure studies that show that NO<sub>2</sub> exposure can intensify responses to allergens in allergic asthmatics.<sup>27</sup> In addition, a number of epidemiological studies have demonstrated associations between NO<sub>2</sub> exposure and premature death, cardiopulmonary effects, decreased lung function growth in children, respiratory symptoms, emergency room visits for asthma, and intensified allergic responses.<sup>28</sup> Infants and children are particularly at risk from exposure to NO<sub>2</sub> because they have disproportionately higher exposure to NO<sub>2</sub> than adults due to their greater breathing rate for their body weight and their typically greater outdoor exposure duration while in adults, the greatest risk is to people who have chronic respiratory diseases, such as asthma and chronic obstructive pulmonary disease.<sup>29</sup> CARB states that much of the information on distribution in air, human exposure and dose, and health effects is specifically for NO<sub>2</sub> and there is only limited information for NO and NO<sub>x</sub>, as well as large uncertainty in relating health effects to NO or NO<sub>x</sub> exposure.<sup>30</sup>

**Carbon Monoxide (CO):** CO is primarily emitted from combustion processes and motor vehicles due to the incomplete combustion of fuel, such as natural gas, gasoline, or wood,

<sup>23</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>, accessed October 28, 2022.

<sup>24</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>, accessed October 28, 2022.

<sup>25</sup> United States Environmental Protection Agency, Nitrogen Dioxide (NO<sub>2</sub>) Pollution, <https://www.epa.gov/no2-pollution/basic-information-about-no2>, last updated August 2, 2022, accessed October 28, 2022.

<sup>26</sup> United States Environmental Protection Agency, Nitrogen Dioxide (NO<sub>2</sub>) Pollution.

<sup>27</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health>, accessed October 28, 2022.

<sup>28</sup> California Air Resources Board, Nitrogen Dioxide & Health.

<sup>29</sup> California Air Resources Board, Nitrogen Dioxide & Health.

<sup>30</sup> California Air Resources Board, Nitrogen Dioxide & Health.

with the majority of outdoor CO emissions from mobile sources.<sup>31</sup> According to the USEPA, breathing air with a high concentration of CO reduces the amount of oxygen that can be transported in the blood stream to critical organs like the heart and brain and at very high levels, which are possible indoors or in other enclosed environments, CO can cause dizziness, confusion, unconsciousness and death.<sup>32</sup> Very high levels of CO are not likely to occur outdoors; however, when CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease since these people already have a reduced ability for getting oxygenated blood to their hearts and are especially vulnerable to the effects of CO when exercising or under increased stress.<sup>33</sup> In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain also known as angina.<sup>34</sup> According to CARB, the most common effects of CO exposure are fatigue, headaches, confusion, and dizziness due to inadequate oxygen delivery to the brain.<sup>35</sup> For people with cardiovascular disease, short-term CO exposure can further reduce their body's already compromised ability to respond to the increased oxygen demands of exercise, exertion, or stress; inadequate oxygen delivery to the heart muscle leads to chest pain and decreased exercise tolerance.<sup>36</sup> Unborn babies, infants, elderly people, and people with anemia or with a history of heart or respiratory disease are most likely to experience health effects with exposure to elevated levels of CO.<sup>37</sup>

**Sulfur Dioxide (SO<sub>2</sub>):** According to the USEPA, the largest source of SO<sub>2</sub> emissions in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities while smaller sources of SO<sub>2</sub> emissions include industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content.<sup>38</sup> In 2006, California phased-in the ultra-low-sulfur diesel regulation limiting vehicle diesel fuel to a sulfur content not exceeding 15 parts per million (ppm), down from the previous requirement of 500 ppm, substantially reducing emissions of sulfur from diesel combustion.<sup>39</sup> According to the USEPA, short-term exposures to SO<sub>2</sub> can harm the

<sup>31</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>, accessed October 28, 2022.

<sup>32</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air, <https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution>, last updated August 2, 2022, accessed October 28, 2022.

<sup>33</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air.

<sup>34</sup> United States Environmental Protection Agency, Carbon Monoxide (CO) Pollution in Outdoor Air.

<sup>35</sup> California Air Resources Board, Carbon Monoxide & Health, <https://ww2.arb.ca.gov/resources/carbon-monoxide-and-health>, accessed October 28, 2022.

<sup>36</sup> California Air Resources Board, Carbon Monoxide & Health.

<sup>37</sup> California Air Resources Board, Carbon Monoxide & Health.

<sup>38</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>, last updated March 9, 2022, accessed October 28, 2022.

<sup>39</sup> California Air Resources Board, Final Regulation Order, Amendments to the California Diesel Fuel Regulations, Amend Section 2281, Title 13, California Code of Regulations, approved July 15, 2004.

human respiratory system and make breathing difficult.<sup>40</sup> According to CARB, health effects at levels near the State one-hour standard are those of asthma exacerbation, including bronchoconstriction accompanied by symptoms of respiratory irritation such as wheezing, shortness of breath and chest tightness, especially during exercise or physical activity and exposure at elevated levels of SO<sub>2</sub> (above 1 ppm) results in increased incidence of pulmonary symptoms and disease, decreased pulmonary function, and increased risk of mortality.<sup>41</sup> Children, the elderly, and those with asthma, cardiovascular disease, or chronic lung disease (such as bronchitis or emphysema) are most likely to experience the adverse effects of SO<sub>2</sub>.<sup>42,43</sup>

**Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>):** Particulate matter air pollution is a mixture of solid particles and liquid droplets found in the air.<sup>44</sup> Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye while other particles are so small they can only be detected using an electron microscope.<sup>45</sup> Particles are defined by their diameter for air quality regulatory purposes: inhalable particles with diameters that are generally 10 micrometers and smaller (PM<sub>10</sub>); and fine inhalable particles with diameters that are generally 2.5 micrometers and smaller (PM<sub>2.5</sub>).<sup>46</sup> Thus, PM<sub>2.5</sub> comprises a portion or a subset of PM<sub>10</sub>. Sources of PM<sub>10</sub> emissions include dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, and wind-blown dust from open lands.<sup>47</sup> Sources of PM<sub>2.5</sub> emissions include combustion of gasoline, oil, diesel fuel, or wood.<sup>48</sup> PM<sub>10</sub> and PM<sub>2.5</sub> may be either directly emitted from sources (primary particles) or formed in the atmosphere through chemical reactions of gases (secondary particles) such as SO<sub>2</sub>, NO<sub>x</sub>, and certain organic compounds.<sup>49</sup> According to CARB, both PM<sub>10</sub> and PM<sub>2.5</sub> can be inhaled, with some depositing throughout the airways; PM<sub>10</sub> is more likely to deposit on the surfaces of the larger airways of the upper region of the lung while PM<sub>2.5</sub> is more likely to travel into and deposit on the surface of the deeper parts of the lung, which can induce tissue damage, and lung inflammation.<sup>50</sup> Short-term (up to 24 hours duration) exposure to PM<sub>10</sub> has been associated primarily with worsening of respiratory diseases, including asthma and

<sup>40</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>, last updated March 9, 2022, accessed October 28, 2022.

<sup>41</sup> California Air Resources Board, 2022, Sulfur Dioxide & Health, <https://ww2.arb.ca.gov/resources/sulfur-dioxide-and-health>, accessed October 28, 2022.

<sup>42</sup> California Air Resources Board, Sulfur Dioxide & Health.

<sup>43</sup> United States Environmental Protection Agency, Sulfur Dioxide (SO<sub>2</sub>) Pollution, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics>, last updated March 9, 2022, accessed October 28, 2022.

<sup>44</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution, <https://www.epa.gov/pm-pollution/particulate-matter-pm-basics>, last updated July 18, 2022, accessed October 28, 2022.

<sup>45</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution.

<sup>46</sup> United States Environmental Protection Agency, Particulate Matter (PM) Pollution.

<sup>47</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>), <https://www.arb.ca.gov/research/aaqs/common-pollutants/pm/pm.htm>, accessed October 28, 2022.

<sup>48</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>).

<sup>49</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>).

<sup>50</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM<sub>2.5</sub> and PM<sub>10</sub>).

chronic obstructive pulmonary disease, leading to hospitalization and emergency department visits.<sup>51</sup> The effects of long-term (months or years) exposure to PM10 are less clear, although studies suggest a link between long-term PM10 exposure and respiratory mortality. The International Agency for Research on Cancer published a review in 2015 that concluded that particulate matter in outdoor air pollution causes lung cancer.<sup>52</sup> Short-term exposure to PM2.5 has been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days and long-term exposure to PM2.5 has been linked to premature death, particularly in people who have chronic heart or lung diseases, and reduced lung function growth in children.<sup>53</sup> According to CARB, populations most likely to experience adverse health effects with exposure to PM10 and PM2.5 include older adults with chronic heart or lung disease, children, and asthmatics and children and infants are more susceptible to harm from inhaling pollutants such as PM10 and PM2.5 compared to healthy adults because they inhale more air per pound of body weight than do adults, spend more time outdoors, and have developing immune systems.<sup>54</sup>

**Lead (Pb):** Major sources of lead emissions include ore and metals processing, piston-engine aircraft operating on leaded aviation fuel, waste incinerators, utilities, and lead-acid battery manufacturers.<sup>55</sup> In the past, leaded gasoline was a major source of lead emissions; however, the removal of lead from gasoline has resulted in a decrease of lead in the air by 98 percent between 1980 and 2014.<sup>56</sup> Lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system, and affects the oxygen carrying capacity of blood.<sup>57</sup> The lead effects most commonly encountered in current populations are neurological effects in children, such as behavioral problems and reduced intelligence, anemia, and liver or kidney damage.<sup>58</sup> Excessive lead exposure in adults can cause reproductive problems in men and women, high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.<sup>59</sup> Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects such as the Project. As a result, lead emissions are not further evaluated.

<sup>51</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

<sup>52</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

<sup>53</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

<sup>54</sup> California Air Resources Board, Inhalable Particulate Matter and Health (PM2.5 and PM10).

<sup>55</sup> United States Environmental Protection Agency, Lead Air Pollution, <https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution>, last updated July 26, 2022, accessed October 28, 2022.

<sup>56</sup> United States Environmental Protection Agency, Lead Air Pollution.

<sup>57</sup> United States Environmental Protection Agency, Lead Air Pollution.

<sup>58</sup> California Air Resources Board, Lead & Health, <https://ww2.arb.ca.gov/resources/lead-and-health>, accessed October 28, 2022.

<sup>59</sup> California Air Resources Board, Lead & Health.

### ***Project Design Features***

The Project would implement the following project design features to minimize construction-related emissions:

**PDF AIR-1:** Construction equipment operating at the Project Site shall be subject to the requirements listed below. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.

- Prior to the issuance of a grading or building permit for each phase, an inventory of off-road heavy-duty construction equipment for that phase of construction, equal to or greater than 50 horsepower that will be used an aggregate of 40 or more hours, shall be provided to the Department of Building and Safety and the Department of City Planning. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification or model year specification and California Air Resources Board or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- Off-road diesel-powered equipment within the construction inventory shall meet the Tier 4 final off-road emissions standards within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a California Air Resources Board certified Level 3 Diesel Particulate Filter or equivalent;
- All cranes and welders shall be electric-powered;
- Forklifts shall be natural gas-powered;
- The Project shall utilize low-VOC coatings where commercially available during construction activities to avoid excessive VOC emissions; and
- Trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities.

### ***Construction***

The greatest potential for exposure to substantial pollutant concentrations and toxic air contaminant (TAC) emissions during construction would be DPM emissions associated with heavy-development equipment operations and truck traffic during construction activities. In addition, fugitive dust emissions may result from other construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials may release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on the most recently adopted thresholds set forth in the SCAQMD's CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following threshold levels: (1) 75 pounds per day for VOCs, (2) 100 pounds per day for NO<sub>x</sub>, (3) 550 pounds per day for CO, (4) 150 pounds per day for sulfur oxides (SO<sub>x</sub>), (5) 150 pounds per day for respirable particulate matter (PM<sub>10</sub>), and (6) 55 pounds per day for fine particulate matter (PM<sub>2.5</sub>).<sup>60</sup>

The Project would involve demolition of the existing buildings and surface parking lot. Construction activities would include demolition, excavation, grading, building construction, architectural coatings, and paving. Heavy-duty off-road equipment, such as excavators, loaders, cranes, and paving equipment would be used during construction. An estimated 7,100 cubic yards of demolition debris would be removed from the Project Site. During demolition, up to approximately 66 truck trips per day would haul away demolition debris (33 inbound, 33 outbound).<sup>61</sup> Project Site grading and excavation would result in approximately 30,695 cubic yards of soil export and 19,671 cubic yards of import resulting in approximately 110 haul truck trips per day (55 inbound, 55 outbound) during excavation. Up to approximately 500 worker trips would occur in a day (250 inbound, 250 outbound) during the building construction phase, with much fewer numbers of worker trips during demolition, grading, foundations, and architectural coating phases of construction.

Construction is anticipated to begin in 2024. The expected duration of construction is approximately 2 years. The Project is anticipated to be fully operational in 2026. Construction may commence at a later date or construction could occur over a longer period of time than that analyzed in this air quality impact analysis. If either or both of these occur, construction impacts would be less than those analyzed, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. Furthermore, construction impacts would be spread out for a longer period of time, which is likely to reduce peak daily emissions. As a result, should Project construction commence on a later date, or occur over a longer period of time than that analyzed in this air quality impact analysis, air quality impacts would be less than the impacts disclosed herein.

During construction, a variety of heavy-duty diesel-powered equipment would be used on-site. Building construction and finishing activities would require equipment such as excavators, cranes, and air compressors. Construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California

<sup>60</sup> South Coast Air Quality Management District, Air Quality Significance Thresholds, Revised April 2019, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed October 28, 2022.

<sup>61</sup> Demolition debris and required haul trucks estimated based on square feet of buildings to be removed and hardscape area.

Emissions Estimator Model (CalEEMod) (Version 2020.4.0), which is a model developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California Air Districts. 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 from a variety of land use projects. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>62</sup> Additionally, the CARB on-road vehicle emissions factor (EMFAC2021) model was used to estimate emissions from mobile sources, such as passenger vehicles and trucks.

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest potential date) and applying the mobile source emissions factors. Emissions from off-road equipment and off-road vehicles were estimated through CalEEMod, since CalEEMod is based on outputs from the CARB off-road emissions factor (OFFROAD), which is the emissions estimation model developed by CARB and used to calculate emissions from construction activities, including off-road vehicles. On-road emissions from worker trips, haul truck trips, concrete truck trips, and vendor truck trips were estimated outside of CalEEMod to account for EMFAC2021 because EMFAC2017 has not yet been incorporated in the current version of CalEEMod. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule provided by the Project's representative. When information was unknown, CalEEMod defaults were used. Detailed construction assumptions and model results are provided in Appendix A of this SCEA.

This emissions analysis for all construction activities includes compliance with mandatory SCAQMD Rule 403 measures regarding the control of fugitive dust and use of low VOC coatings consistent with SCAQMD Rule 1168. For modeling purposes within CalEEMod, compliance with Rule 403 is accounted for by incorporating watering three times daily, which the SCAQMD estimates a 61 percent control efficiency for fugitive dust PM10 and PM2.5 emissions.

Emissions from these activities were estimated by construction phase. The maximum daily emissions were predicted values for the worst-case day and do not represent the emissions that would occur daily during Project construction. The maximum daily emissions were compared to the SCAQMD daily regional thresholds of significance. **Table 5-2, *Maximum Regional Construction Emissions With PDF AIR-1***, presents the Project's net regional construction emissions with PDF AIR-1, along with the regional significance thresholds for each air pollutant.

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<sup>62</sup> South Coast Air Quality Management District, California Emissions Estimator Model, <http://www.aqmd.gov/caleemod/>, accessed October 28, 2022.

**TABLE 5-2  
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS WITH PDF AIR-1 (POUNDS PER DAY)**

<b>Phase and Year</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>PM10<sup>a</sup></b>	<b>PM2.5<sup>a</sup></b>
Demolition	0.6	13.4	16.7	0.1	2.4	0.6
Grading	1.0	21.7	25.7	0.1	3.2	0.9
Mat Foundation	0.7	9.6	34.0	0.1	2.4	0.7
Paving	0.1	0.6	7.6	<0.1	0.3	0.1
Building Construction	0.7	5.7	37.7	0.1	5.5	1.4
Architectural Coating	26.7	3.2	15.9	<0.1	1.1	0.3
<b>Maximum Daily Emissions</b>	<b>26.7</b>	<b>21.7</b>	<b>37.7</b>	<b>0.1</b>	<b>5.5</b>	<b>1.4</b>
<b>SCAQMD Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Exceeds Thresholds?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

## NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A of this SCEA.

<sup>a</sup> Emissions include fugitive dust control measures in compliance with SCAQMD Rule 403.

SOURCE: ESA, 2022.

As shown in Table 5-2, the Project's maximum regional construction emissions would not exceed the thresholds for non-attainment pollutants of O<sub>3</sub> precursors (i.e., VOC and NO<sub>x</sub>), PM10, and PM2.5. In addition, construction emissions from the Project would not exceed the SCAQMD regional significance thresholds for attainment or maintenance criteria air pollutants (i.e., CO and SO<sub>2</sub>). The Project's regional construction emissions impacts would be less than significant.

### Operation

The SCAQMD has separate significance thresholds to evaluate a project's potential criteria air pollutant impacts associated with long-term project operations. Based on the most recently adopted thresholds set forth in the SCAQMD's CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO<sub>x</sub>, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO<sub>x</sub>, (5) 150 pounds per day for PM10, and (6) 55 pounds per day PM2.5.<sup>63</sup>

<sup>63</sup> South Coast Air Quality Management District, Air Quality Significance Thresholds, Revised April 2019, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed October 28, 2022.



The operation of the Project has the potential to generate net additional criteria pollutant emissions through the additional vehicle trips traveling to and from the Project Site it would generate over the existing condition. In addition, emissions would result from area sources located on-site, such as landscaping equipment, and use of consumer products. The Project is not expected to contain any large stationary combustion equipment, such as large boilers or combustion turbines.

Operational emissions of the Project's on-site sources (i.e., area) were estimated using the CalEEMod software with an operational year of 2026. The Project would not include natural gas infrastructure. Therefore, operation of the Project would not result in natural gas combustion emissions. The Project would be powered by electricity provided by the local utility provider. The Project's operational area source emissions would be generated from the use of landscaping equipment, use of household consumer products (e.g., household cleaning products, personal grooming products) and application of maintenance architectural coatings. Detailed operation assumptions and CalEEMod modeling results are provided in Appendix A of this SCEA.

For mobile sources, existing vehicle trips as well as the estimated vehicle trips and maximum daily VMT were provided for the Project uses in the Project's Transportation Assessment where the VMT analysis used the City's VMT analysis procedures and LA VMT Calculator.<sup>64</sup> Mobile source emissions calculations utilize the VMT along with emission factors from the EMFAC2021 model. EMFAC2021 was run in the emissions mode (also referred to as the "Burden" mode) and used to generate South Coast Air Basin-specific vehicle fleet emission factors in units of pounds or metric tons (MT) per mile. These emission factors were then applied to the daily VMT to obtain daily mobile source emissions. The VMT estimates take into account trip and VMT reductions from Project land use characteristics, including nearby transit options and improved walkability from the nearby presence of off-site recreational, residential, commercial, restaurant, and office land uses.

The estimated emissions generated by the existing land uses in operation under existing conditions on the Project Site (existing emissions) were subtracted from the estimated emissions generated by the land uses proposed by the Project (project emissions) to determine the Project's net emissions. Area and energy source emissions for the existing uses in operation under existing conditions (i.e., creative office and warehouse uses) were estimated using CalEEMod using the same methodology as was described for the Project, with the exception of an operational year of 2022. Mobile source emissions were estimated using VMT derived from CalEEMod based on trip generation factors for manufacturing and office uses within CalEEMod based on the Institute of Transportation Engineers 10<sup>th</sup> Edition and mobile source emission factors from EMFAC2021. The results of the regional criteria pollutant emission calculations for VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are presented in **Table 5-3, *Estimated Maximum Regional Operational Emissions***. The Project's full buildout maximum regional emissions from operational activities would

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<sup>64</sup> Gibson Transportation Consulting, Inc., Transportation Assessment for the 4112 Del Rey Avenue Residential Project, October 2022. Refer to Appendix K of this SCEA.

be below the SCAQMD significance thresholds. Therefore, the Project's impact related to regional operational emissions would be less than significant.

**TABLE 5-3**  
**ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY) <sup>a</sup>**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM10	PM2.5
<b>Existing Uses</b>						
Area (Coating, Consumer Products, Landscaping)	0.7	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile	0.9	1.4	8.1	<0.1	0.5	0.1
Total Existing	1.6	1.5	8.2	<0.1	0.5	0.1
<b>Project</b>						
Area (Coating, Consumer Products, Landscaping)	6.1	0.2	17.3	<0.1	0.1	0.1
Energy	0	0	0	0	0	0
Mobile	1.9	2.6	17.0	0.1	1.3	0.3
Total Project	8.0	2.8	34.3	0.1	1.4	0.4
<b>Net Total (Project minus Existing Uses)</b>	<b>6.8</b>	<b>1.3</b>	<b>26.1</b>	<b>0.1</b>	<b>0.9</b>	<b>0.4</b>
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Exceeds Thresholds?	No	No	No	No	No	No

NOTES:

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A of this SCEA.

SOURCE: ESA, 2022.

## Conclusion

The Project's regional operational impacts would be less than significant, and mitigation measures are not required.

### c. Expose sensitive receptors to substantial pollutant concentrations?

**Less Than Significant Impact.** Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook,<sup>65</sup> a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities, (2) rehabilitation centers, (3) convalescent centers, (4) retirement homes,

<sup>65</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993.

(5) residences, (6) schools, (7) parks and playgrounds, (8) childcare centers, and (9) athletic fields.

Air quality sensitive receptors located in proximity to the Project Site include the following land uses:

- **North** – Residential land uses immediately north of the Project Site.
- **East** – Residential land uses east/northeast of the Project Site, approximately 250 feet or more from the Project Site, beyond intervening commercial/industrial buildings.
- **South** – Residential land uses south of the Project Site, approximately 215 feet or more from the Project Site beyond intervening commercial/industrial buildings.
- **West** – Residential land uses west of the Project Site approximately 430 feet and greater from the Project Site beyond intervening commercial buildings.

### **Construction**

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).<sup>66</sup> The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the Project. The closest existing sensitive receptors to the Project Site are the people residing in the apartments to the northwest and northeast of the Project Site. Therefore, the thresholds used for the LST analysis were based on the approximately 2.83-acre Project Site in the Northwest Coastal LA County Source (source receptor area number 2) with sensitive receptors located adjacent to the Project Site (i.e., 25 meters).

The localized effects from the on-site portion of the Project's daily emissions were evaluated at the sensitive receptor locations that would be potentially impacted by the Project according to the SCAQMD's LST methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards. The Project will incorporate PDF AIR-1 into the Project, which includes specific baseline development features that will be implemented by the Applicant. A discussion of the Project's localized construction emissions without implementation of PDF AIR-1 is included for informational purposes to disclose the emissions levels without the incorporation of these development features. **Table 5-4, *Maximum Localized Construction Emissions With PDF AIR-1***, presents the project's localized construction emissions with PDF AIR-1, along with the LSTs for each air pollutant.

As shown in Table 5-4, the Project's maximum localized construction emissions would not exceed the thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. Therefore, the Project's

<sup>66</sup> South Coast Air Quality Management District, *Localized Significance Thresholds*, 2003, revised 2008, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed October 28, 2022.

localized construction impacts would be less than significant, and mitigation measures are not required.

**TABLE 5-4**  
**MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS WITH PDF AIR-1 (POUNDS PER DAY)**

<b>Phase</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM10<sup>a</sup></b>	<b>PM2.5<sup>a</sup></b>
Demolition	1.6	7.8	0.7	0.1
Grading	2.0	10.8	0.3	0.1
Mat Foundation	3.4	25.6	0.1	0.1
Paving	0.5	6.7	<0.1	<0.1
Building Construction	2.4	20.5	<0.1	<0.1
Architectural Coating	2.6	12.7	<0.1	<0.1
<b>Maximum Localized (On-Site) Emissions</b>	3.4	25.6	0.7	0.1
<b>SCAQMD Threshold<sup>b</sup></b>	<b>147</b>	<b>827</b>	<b>6</b>	<b>4</b>
Exceeds Threshold?	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A of this SCEA.

<sup>a</sup> Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

<sup>b</sup> The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal LA County) for a 2-acre site with sensitive receptors conservatively assumed to be located adjacent to the construction area.

SOURCE: ESA, 2022.

Temporary TAC emissions associated with DPM emissions from heavy-duty construction equipment would occur during the construction phase of the Project. According to OEHHA and the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,<sup>67</sup> health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (approximately 2 years), the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of Project construction.

In addition, the Project would be consistent with the applicable 2016 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition and construction activities. Based on

<sup>67</sup> SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

the short-term duration of Project construction and compliance with regulations that would minimize emissions, construction of the Project would not expose sensitive receptors to substantial TAC concentrations.

Furthermore, as discussed in Threshold (b), the Project will implement project design feature PDF AIR-1, which would reduce criteria pollutant emissions and would have co-benefits of reducing emissions of DPM from heavy-duty diesel construction equipment. Therefore, impacts from TACs during construction would be less than significant.

### **Operation**

Similar to the localized construction impacts analysis, the screening criteria provided in the SCAQMD *Localized Significance Threshold Methodology* were used to determine localized operational impacts for the Project. With regard to on-site sources of emissions, the Project would generate emissions resulting from sources such as landscaping equipment. A summary of maximum daily localized operational emissions resulting from Project operations is presented in **Table 5-5, Maximum Localized Operational Emissions**, along with the LSTs. As shown in Table 5-5, the Project's maximum localized emissions would not exceed the SCAQMD LSTs and localized operational impacts would be less than significant. No mitigation measures would be required.

**TABLE 5-5  
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)**

<b>Phase</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>PM10</b>	<b>PM2.5</b>
<b>Existing Uses</b>				
Area (Coating, Consumer Products, Landscaping)	<0.1	<0.1	<0.1	<0.1
Energy (Natural Gas)	0.1	0.1	<0.1	<0.1
Total Existing	0.1	0.1	<0.1	<0.1
<b>Project</b>				
Area (Coating, Consumer Products, Landscaping)	0.2	17.3	0.1	0.1
Energy (Natural Gas)	0	0	0	0
Total Project	0.2	17.3	0.1	0.1
<b>Net Total (Project minus Existing Uses)</b>	<b>0.1</b>	<b>17.2</b>	<b>0.1</b>	<b>0.1</b>
<b>SCAQMD Threshold<sup>a</sup></b>	<b>147</b>	<b>827</b>	<b>2</b>	<b>1</b>
Exceeds Threshold?	No	No	No	No

**NOTES:**

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in E Appendix A of this SCEA.

<sup>a</sup> The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal LA County) for a 2-acre site with sensitive receptors conservatively assumed to be located adjacent to the operational area.

SOURCE: ESA, 2022.

The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed below, this comparison demonstrates that the Project would not cause or contribute considerably to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the threshold one-hour and eight-hour ambient air quality standards (CAAQS) of 20 or 9.0 parts per million (ppm), respectively within one-quarter mile of a sensitive receptor, and that no further CO analysis is warranted or required.

CO levels in the Project area are substantially below the federal and the State standards. According to SCAQMD monitoring data for Source Receptor Area 2 (Northwest Coastal LA County), maximum CO levels in recent years (2019-2021) were 2.0 ppm (one-hour average) and 1.2 ppm (eight-hour average) as compared to the criteria of 20 ppm (CAAQS one-hour average) or 35 ppm (NAAQS one-hour average) and 9.0 ppm (eight-hour average). No exceedances of the CO standards have been recorded at monitoring stations in the Air Basin since 2003,<sup>68</sup> and the Air Basin is currently designated as a CO attainment area for both the CAAQS and the NAAQS.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These included the intersections of Wilshire Boulevard and Veteran Avenue, Sunset Boulevard and Highland Avenue, La Cienega Boulevard and Century Boulevard, and Long Beach Boulevard and Imperial Highway. In the 2003 AQMP CO attainment demonstration, the SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.<sup>69</sup> Relevant information from the 2003 AQMP CO attainment demonstration relied upon in this assessment is provided in Appendix C of this Draft EIR. This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP showed that the peak modeled CO concentration due to vehicle emissions (i.e., excluding background concentrations) at these four intersections was 4.6 ppm (one-hour average) and 3.2 ppm (eight-hour average) at Wilshire Boulevard and Veteran Avenue.<sup>70</sup>

Based on the Project's Transportation Assessment,<sup>71</sup> under Future with Project Conditions (year 2026), the intersection of Lincoln Boulevard and Maxella Avenue would have a maximum traffic volume of up to approximately 52,430 average daily trips (ADT).<sup>72</sup>

<sup>68</sup> SCAQMD, Final 2016 AQMP, March 2017, page 2-38.

<sup>69</sup> SCAQMD, 2003 AQMP, Appendix V: Modeling and Attainment Demonstrations, page V-4-24, 2003.

<sup>70</sup> The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

<sup>71</sup> Gibson Transportation Consulting, Inc., Transportation Assessment for the 4112 Del Rey Avenue Residential Project, October 2022. Refer to Appendix K of this SCEA.

<sup>72</sup> The traffic volume of approximately 52,430 ADT was estimated based on the peak hour intersection volumes under Future with Project Conditions and the general assumption that peak hour trips

As a result, CO concentrations from the Project's maximum traffic volume at the intersection identified above plus the measured background level in the Project Site area are expected to be approximately 4.4 ppm (one-hour average) and 2.9 ppm (eight-hour average) or less, which would not exceed the numerical thresholds of significance. This comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. Therefore, the Project would result in less-than-significant impacts with respect to CO hotspots.

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

**Less than Significant Impact.** Objectionable odors are typically associated with industrial activities involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project includes new residential uses within the Project Site that would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Activities and materials associated with construction would be typical of construction projects of similar type and size. On-site trash receptacles would be covered and properly maintained in a manner that promotes odor control. Any odors that may be generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Odors associated with Project operation would be limited to those typical activities associated with on-site waste generation and disposal (e.g., trash cans, dumpsters) and occasional minor odors generated during food preparation activities. Thus, Project operation is not expected to create substantial objectionable odors. Impacts with regard to odors would be less than significant and no mitigation measures would be required.

As indicated in the analysis above, emissions of attainment or unclassified pollutants (e.g., CO, SO<sub>2</sub>) would not exceed the applicable regional or LSTs for construction or operations. Impacts with regard to other emissions would be less than significant and no mitigation measures would be required.

**Cumulative Impacts**

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

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represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art (2.0 Standard Approaches, [http://www.fhwa.dot.gov/planning/tmip/publications/other\\_reports/tod\\_modeling\\_procedures/ch02.cfm](http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm)).

considerable.<sup>73</sup> 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 shown above, the Project’s emissions would not exceed any of the SCAQMD’s regional or localized significance thresholds. Therefore, the Project’s contribution to cumulative air quality impacts would be less than significant.

## IV. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>73</sup> SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>, August 2003.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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 a highly urbanized portion of the Community Plan area, and is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. The Project Site consists entirely of developed areas and ornamental landscaping. No trees are currently located on site. Due to the lack of suitable habitat on the Project Site, no special status-wildlife plant or species are anticipated to occur on the Project Site. Therefore, no impacts to candidate, sensitive, or special status plant species would occur, and no mitigation measures would be required.

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

**No Impact.** As discussed in the response to Checklist Question IV.a, above, the Project Site consists entirely of developed areas and/or ornamental landscaping. As described in the *4112 Del Rey Avenue, Marina Del Rey, California 90292 – City of Los Angeles Tree Report* (Tree Report), prepared for the Project by Carlberg Associates in September 2022 (refer to Appendix B), no trees are currently located on site. Two Mexican fan palms are located off site adjacent to the Project’s northern boundary. These palms are not considered a protected species as set forth by the City’s Tree Preservation Ordinance No. 186,873. The Project Site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area.<sup>74, 75</sup>

<sup>74</sup> Los Angeles County, Significant Ecological Areas and Coastal Resource Areas Policy Map, 2015.

<sup>75</sup> Los Angeles County, GIS-NET Public, 2022, <https://planning.lacounty.gov/gisnet>, accessed September 8, 2022.

Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community, and no mitigation measures would be required.

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

**No Impact.** As previously discussed, the Project Site consists entirely of developed areas and/or ornamental landscaping, and no trees are currently located on site.<sup>76</sup> The Project Site does not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands and no mitigation measures would be required.

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

**No Impact.** The Project Site is surrounded by urban development and is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. There are no established native resident or migratory wildlife corridors on the Project Site or in the immediately adjacent vicinity. No water bodies that could serve as habitat for fish exist on the Project Site or in the immediate vicinity. Additionally, no trees are currently present on site.<sup>77</sup> Therefore, the Project would not substantially interfere with the movement of 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 would occur, and no mitigation measures would be required.

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

**No Impact.** The Project Site is within an urban part of the City and is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. As previously discussed, no trees are currently present on the Project Site.<sup>78</sup> Therefore, the Project would not conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impact would occur, and no mitigation measures would be required.

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<sup>76</sup> Carlburg Associates, 4112 Del Rey Avenue, Marina Del Rey, California 90292 – City of Los Angeles Tree Report, September 21, 2022. Refer to Appendix B of this SCEA.

<sup>77</sup> Carlburg Associates, 4112 Del Rey Avenue, Marina Del Rey, California 90292 – City of Los Angeles Tree Report, September 21, 2022. Refer to Appendix B of this SCEA.

<sup>78</sup> Carlburg Associates, 4112 Del Rey Avenue, Marina Del Rey, California 90292 – City of Los Angeles Tree Report, September 21, 2022. Refer to Appendix B of this SCEA.

**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.** As discussed in the response to Checklist Question IV.a, above, the Project Site is located within a developed, urbanized area and does not provide habitat for any sensitive biological resources. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.<sup>79</sup> The Project would not conflict with the provisions of any adopted conservation plan. Therefore, no impacts would occur, and no mitigation measures would be required.

**Cumulative Impacts**

The 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K) are located in highly urban areas and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the City’s protected tree regulations as well as the Migratory Bird Treaty Act. 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.

**V. Cultural Resources**

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

<sup>79</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019, <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>, accessed on September 8, 2022.

The analysis is based on the information provided in the *Historic Resources Assessment Report, 4112-4136 Del Rey Avenue* (Historical Resources Assessment) prepared by Environmental Science Associates (ESA) in October 2022, and contained in Appendix C-1, and the *Cultural Resources Assessment Report, 4112 Del Rey SCEA Project, City of Los Angeles, California* (Cultural Resources Assessment) prepared by ESA in October 2022, and contained in Appendix C-2 of this SCEA.

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

**Less-than-Significant Impact.** On September 20, 2022, a cultural resources records search was conducted at the California Historical Resources Information System South Central Coastal Information Center (SCCIC), California State University, Fullerton. Results of that records search indicated that 28 cultural resource studies have been conducted within a 0.25-mile radius of the Project Site (study area). There are no previous studies within or overlapping the Project Site. Five cultural resources have been previously recorded within the 0.25-mile study area. Three of the five of the resources are historic built environment resources. All three historic built environment resources were evaluated as ineligible, and once has since been demolished. No cultural resources have been previously recorded within the Project Site itself. The nearest previously recorded resource is the 4144 S. Lincoln Boulevard/Schwartzkopf Exclusive Customs, which is approximately 213 feet (0.04 miles) southwest of the Project Site.

The Project Site is currently developed with six low-scale (one-story) industrial buildings and a surface parking lot. A site visit of the Project Site was conducted on August 8, 2022. This site visit included an intensive pedestrian survey to document the existing conditions of the Project Site and vicinity. During the visit the Project Site was documented with digital photography.

The industrial buildings located on the Project Site were evaluated under the following historical and architectural themes: Post-World War II Industrial Design, 1945-1970, which includes the industrial park subtype. Research was also conducted on the Project Site's construction, occupancy history, and developers Park Brothers Company. The buildings are not distinctive enough to be evaluated individually, given their shared ownership, development histories, and architectural character. An analysis to comply with CEQA was conducted to assess the existing improvements on the Project Site for eligibility as a potential historic district grouping for listing in the National Register, California Register of Historical Resources (California Register), as well as for local designation as a Los Angeles Cultural Heritage Monument. The results of the analysis are presented in the Historical Resources Assessment (refer to Appendix C-1), and summarized below.

The potential historic district grouping on the Project Site was found ineligible under the applicable Federal, State, and local criteria due to lack of significance. The period of significance associated with the building grouping on the Project Site is 1958-1966, when the Park Brothers Company developed the Project Site as an investment property with industrial buildings for rent or lease. The Park Brothers Company was not a notable

developer and this Project Site appears to be their only project. The industrial grouping was not found to be significant in the history of industrial parks or for patterns of industrial development in the area. While the Project Site was designed in the utilitarian industrial style, there was no associated architect with the site's development, and no further information on the associated engineer Harold E. Bird or contractor Philip S. Montgomery. Further, the industrial building grouping in its current state is not a distinctive example of the industrial style or an industrial park. As such, the Project Site does not have sufficient historical associations to be eligible as a potential district.

To be eligible for listing in the national, state, and local registers, a property must have significant historical associations, and retain historic integrity from the period in which it gained significance. As discussed above and presented in detail in the Historic Resources Assessment Report, the potential historic district grouping does not have significant historical associations and does not meet the eligibility criteria for designation as a historical resource pursuant to CEQA. Furthermore, due to multiple tenant improvements over the years to modify the buildings to accommodate new tenants after the period of significance, the industrial buildings do not retain integrity either individually or as a group from their period of significance. As the potential district grouping lacks historical associations, architectural distinction, and historic integrity, the buildings on the Project Site are not considered historical resources in pursuant to CEQA. The building grouping has been assigned a California Historic Resource (CHR) Status Code of 6Z, as the Project Site does not appear eligible for Federal, State, or local designation through this survey evaluation.

As discussed above, no historical resources were identified with the Project Site. As such, the Project would have no direct impacts to historical resources within the Project Site. The Project vicinity is improved with commercial/industrial buildings and multi-family residential buildings with surface parking along Del Rey Avenue and S. Lincoln Boulevard. The one previously identified resource, 4144 S. Lincoln Boulevard/Schwartzkopf Exclusive Customs (4140 and 4144 S. Lincoln Boulevard), is oriented facing Lincoln Boulevard and is located approximately 213 feet (0.04 miles) southwest of the Project Site.

While the Project would be indirectly visible from the rear of 4140 and 4144 S. Lincoln Boulevard, the Project would not have an adverse physical or visual impact on this identified historical resource, as described below.

4140 and 4144 S. Lincoln Boulevard is located 213 feet (0.04 miles) southwest of the Project Site and sits along S. Lincoln Boulevard. The building was recognized on SurveyLA in 2014 as "Excellent and rare example of A-frame commercial architecture in Venice."<sup>80</sup> The Project would not directly or indirectly impact 4140 and 4144 S. Lincoln Boulevard either physically through alteration or demolition or visually by proximate new

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<sup>80</sup> SurveyLA, "Resource Report: Schwartzkopf Exclusive Customs," Historic Places LA website, 2014, <http://historicplacesla.org/reports/74ec61bf-0d4c-417c-a542-65c79369536f>, accessed October 27, 2022.

construction. The Project would be partially visible in the distant background of the 4140 and 4144 S. Lincoln Boulevard when looking east towards the Project from the building's entrance along S. Lincoln Boulevard. The view would not be blocked or impacted by the new construction as part of the Proposed Project, and the new construction would not have any adverse physical impact on 4140 and 4144 S. Lincoln Boulevard through demolition or alteration of the surrounding non-contributing setting. Neither the existing improvements on the Project Site nor the built environment setting along S. Lincoln Drive, or Del Rey Avenue contribute to the eligibility of 4140 and 4144 S. Lincoln Boulevard. The Project would not have an adverse physical impact through demolition or alteration of the Project Site that is part of the surrounding non-contributing setting of 4140 and 4144 S. Lincoln Boulevard, and 4140 and 4144 S. Lincoln Boulevard would retain its existing eligibility as a historical resource after Project completion.

Therefore, the Project would result in less-than-significant direct and indirect impacts to historical resources and no mitigation measures would be required.

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

**Less than Significant with Mitigation Incorporated.** CEQA Guidelines Section 15064.5(a)(3)(D) generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

ESA conducted a cultural resources records search on September 20, 2022 at the California Historical Resources Information System-South Central Coastal Information Center (CHRIS-SCCIC) housed at California State University, Fullerton. The record search included a review of all previously recorded cultural resources (archaeological and built environment) and previous studies within the Project Site and a 0.50-mile radius. Twenty-seven previous studies have been conducted within a 0.50-mile radius of the Project Site. No previous reports overlap the Project Site.

Five cultural resources have been previously recorded within the 0.5-mile records search radius of the Project Site. No cultural resources have been previously recorded within the Project Site itself. However, one prehistoric site, associated with the village of Sa' anga, is located in the general vicinity of the Project Site, and one historic archaeological site is also located within close proximity to the Project Site.

The California Native American Heritage Commission (NAHC) was contacted on July 15, 2022, to request a search of the Sacred Lands File (SLF). The NAHC responded to the request in a letter dated August 29, 2022 indicating that the results were positive and to contact the Gabrielino Tongva Indians of California Tribal Council. As discussed in Checklist Questions XVIII.a and XVIII.b below, notwithstanding that AB 52 consultation is not normally performed in connection with the preparation of SCEAs, the City has

conducted consultation with this tribe per the recommendations of the NAHC and has elected to implement Mitigation Measure MM-CULT-1, as outlined below.

According to the Phase I Environmental Site Assessment (Phase I ESA), the Project Site was occupied by residences as early as 1928, and a milk barn and milk house from 1938 to 1958.<sup>81</sup> The existing buildings in the Project Site were built in phases from 1958 to 1963.

Review of the Geotechnical Report, indicates that the Project Site is mapped as underlain by Holocene-aged alluvial sediments (Qa) consisting of gravel, sand, and clay derived mainly from the Santa Monica Mountains with gravel and sand of minor stream channels.

The Geotechnical Report conducted a subsurface investigation consisting of seven exploratory borings (B-1 through B-5, P-1 and P-2) and four cone penetration tests (CPT-1 through CPT-4). Borings B-1 through B-5 [were drilled to approximate depths of 26.5 and 51.5 feet below ground surface (bgs)], while borings P-1 and P-2 were concluded at 5 feet bgs. The CPTs reached a maximum depth of 60 feet bgs. From the surface down to 3 to 4.5 inches, asphalt concrete was encountered over 2 to 6 inches of aggregate base materials. The borings and the CPTs encountered 2 to 7 feet of undocumented fill (made up of sandy lean clay and sandy silt) beneath the pavement. The Geotechnical Report also mentions that “native soils” were found beneath the fill. The native soils are described as “medium stiff to very stiff sandy lean clay and lean clay with sand bedded with medium dense silty sand in the upper 23 feet underlain by dense to very dense silty sand and poorly graded sand with silt to the maximum exploration depth at approximately 51.5 feet bgs”.<sup>82</sup>

Review of the Geotechnical Report indicates that fill soils occur within the Project Site at varying depths from surface down to 2 and 7 feet bgs, and that fill soils are underlain by “native soils”. The Geotechnical Report also indicates these “native soils” consist of Holocene-aged alluvial sediments, which encompass the entirety of human occupation in North America, and is, therefore, conducive to the preservation of subsurface prehistoric archaeological deposits. Moreover, La Ballona Lagoon and one prehistoric archaeological resource (associated with the village of Sa’ anga) are located in relatively close proximity to the Project Site (approximately between 0.25 and 0.35 miles away), and the SLF results yielded positive results. These results would indicate a degree of sensitivity for the presence of prehistoric subsurface archaeological deposits. Nevertheless, the Project Site has been subject to previous disturbances (which likely included historic disturbance) as indicated by the historic topographic map, aerial photograph, and Phase I ESA. For instance, the Project Site was first developed by at least 1923 with at least one structure, then later in the 1930s, 1940s, and 1950s additional structures were constructed throughout the Project Site. By at least 1963, the previous

<sup>81</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, 4112 Del Rey Avenue, Marina Del Rey, California, 90292, April 20, 2022. Refer to Appendix H-1 of this SCEA.

<sup>82</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022, p. 3. Refer to Appendix E of this SCEA.

structures appear to be demolished and four of the existing current six structures were present. Finally, by at least 1977, all of the existing structures and associated parking lot (located within the central portion of the Project Site) had been constructed. Based on these results, the potential to encounter prehistoric archaeological resources within the Project Site is considered moderate based on the disturbance level that would be required for the historic buildings on site and the possibility that they are capping the native soil which could potentially contain prehistoric archaeological resources.

### ***Historical Archaeological Analysis***

As previously mentioned, the Project Site was subject to historic-period land uses (family dwellings, a milk barn and milk house) starting in the 1920s through the 1950s, and eventually in the 1970s for the construction of the existing structures (located on the eastern and western portions of the Project Site). Currently, the central portion of the Project Site is developed with a surface parking lot. Parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for parking lots are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the asphalt pavement could have served as a barrier that could have prevented further impacts to any such resources. Additionally, one historic-period archaeological resource is located within close proximity to the Project Site and yielded trash pits, a well shaft with lining, and artifacts. Given the identification of historic-period archaeological resources in the vicinity and the potential for past and current land uses to have capped and sealed archaeological resources, the potential to encounter historic-period archaeological resources, especially in the central portion of the Project Site, is considered moderate to high.

The archaeological sensitivity assessment has indicated that the potential for encountering prehistoric archaeological resources is moderate across the Project Site while the potential for historic-period archaeological resources, especially in the central portion of the Project Site, is considered moderate to high. Therefore, impacts to previously unknown buried archaeological resources due to construction of the Project would be potentially significant, and the following mitigation measures are provided in order to reduce impacts to archaeological resources to a less-than-significant level under CEQA.

### ***Mitigation Measures***

**MM CULT-1:** Prior to the issuance of a demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during initial Project construction work which shall exceed 2-feet in depth, such as demolition, grading, trenching, or related moving of soils within the Project Site (collectively, ground disturbing activities); provided, however, that ground disturbing activities shall not include any moving of soils after they have been initially disturbed or displaced by Project-related construction. The Qualified Archaeologist shall determine the frequency of monitoring based on the rate of excavation and grading activities, proximity to



known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. The frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist.

Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.

In the event that historic or prehistoric archaeological resources (e.g., bottles, foundations, refuse dumps, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. After consulting with the Applicant, the Qualified Archeologist shall establish an appropriate buffer in accordance with industry standards, reasonable assumptions regarding the potential for additional discoveries in the vicinity, and safety considerations for those making an evaluation and potential recovery of the discovery. This buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area.

All archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist. If the Qualified Archaeologist determines the find to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist shall coordinate with the Applicant and the City of Los Angeles (City) to develop a reasonable and feasible treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the material. If no institution accepts the resources, they may be donated to a local school or historical society in the area for educational purposes.

The Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned

agencies to signify the satisfactory completion of the Project and required mitigation measures.

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

**Less than Significant with Mitigation Incorporated.** The California NAHC was contacted to request a search of the SLF. The NAHC was contacted on July 15, 2022 to request a search of the SLF. The NAHC responded to the request in a letter dated August 29, 2022 indicating that the results were positive and to contact the Gabrielino Tongva Indians of California Tribal Council. As discussed in Checklist Questions XVIII.a and XVIII.b below, notwithstanding that AB 52 consultation is not normally performed in connection with the preparation of SCEAs, the City has conducted consultation with this tribe per the recommendations of the NAHC and has elected to implement Mitigation Measure MM-CULT-1 as previously outlined. Archival research did not reveal any evidence that human remains could be found at the Project Site or in the area adjacent to the Project Site. Even so, construction of the Project could potentially disturb previously unknown human remains. Implementation of MM CULT-2 would ensure impacts related to the discovery of human remains would be reduced to a less-than-significant level.

***Mitigation Measures***

**MM CULT-2:** If human remains are encountered, the Project Applicant shall halt work in the vicinity (within 100 feet) of the discovery and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC shall be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendent (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

**Cumulative Impacts**

As discussed above, the Project would not result in 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 that involves ground-disturbing activities is required to implement standard City conditions of approval related to the discovery of archaeological resources, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

## VI. Energy

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

The analysis is based on the information provided in the Project-specific energy calculations contained in Appendix D of this SCEA.

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

**Less Than Significant Impact.** As demonstrated in the analysis of the eight criteria discussed below, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project’s energy requirements would not significantly affect local and regional supplies or capacity. The Project’s energy usage during peak and base periods would also be consistent with future projections of electricity for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with and exceed the minimum requirements of the existing energy efficiency requirements such as the Title 24 standards and CALGreen Code. In summary, the Project’s energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards.

The following analysis considers the topics identified above under both Appendices G and F of the CEQA Guidelines to determine whether this significance threshold would be exceeded.

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

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction and operations). For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings, which are included as part of Project operations.

***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 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 debris and earth material during the demolition and excavation phases to off-site reuse and disposal facilities).

**Table 5-6, *Summary of Energy Use During Project Construction***, summarizes the summary of the annual average electricity, gasoline fuel, and diesel fuel estimated to be consumed during Project construction is provided. Each of these is discussed and analyzed in greater detail in the sections below. As shown in Table 5-6, construction of the Project would result in an annual average construction electricity usage of approximately 14,622 kilowatt-hours per year (kWh/yr) and would consume approximately 41,511 and 60,551 gallons of gasoline and diesel per year, respectively, during the approximate 2 year construction duration.

**TABLE 5-6  
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION**

<b>Energy Type</b>	<b>Total Quantity</b>	<b>Annual Average Quantity during Construction</b>
<b>Electricity (kWh)</b>		
Water Consumption	27,500	12,500
Construction Office	4,700	2,122
<b>Total Electricity</b>	<b>32,200</b>	<b>14,622</b>
<b>Gasoline (gallons)</b>		
Worker Vehicles	91,324	41,511
<b>Total Gasoline</b>	<b>91,324</b>	<b>41,511</b>
<b>Diesel (gallons)</b>		
Off-Road Construction Equipment	73,606	33,457
On-Road Construction Equipment – Haul Trucks	38,895	17,680
On-Road Construction Equipment – Vendor Trucks	20,711	9,414
<b>Total Diesel</b>	<b>133,213</b>	<b>60,551</b>

kWh = kilowatt-hours

Detailed calculations are provided in Appendix D of this SCEA.

SOURCE: ESA, 2022.

### *Electricity*

Electricity would be consumed to supply and convey water for dust control and for an onsite construction trailer, 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 Los Angeles Department of Water and Power (LADWP) and would be obtained from temporary power poles installed during Project construction providing electricity from the existing electrical lines that connect to the Project Site, consistent with suggested measures in the CEQA Thresholds Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators. Other electrical uses are assumed to have a negligible impact on LADWP resources. During construction of the Project, electricity demand from the existing on-site uses (the creative office and warehouse uses) would be eliminated prior to demolition.

As shown in Table 5-6 above, annual average construction electricity usage would be approximately 14,622 kWh. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated annual average construction electricity usage would be within the supply and infrastructure service capabilities of LADWP, as the construction demand would represent approximately 0.57 percent of the estimated net annual operational electricity demand for the Project and 0.0001 percent of the estimated annual sales of LADWP, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.<sup>83,84</sup>

### *Natural Gas*

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no expected demand generated by construction of the Project. Therefore, Project impacts on natural gas supply and infrastructure associated with construction activities would be less than significant.

### *Transportation Energy*

The petroleum-based fuel use summary provided above in Table 5-6 represents the amount of transportation energy that could potentially be consumed during Project construction based on the conservative set of assumptions, provided in Appendix D, of this SCEA. As shown, on- and off-road vehicles would consume an estimated total of 91,324 gallons of gasoline and approximately 133,213 gallons of diesel fuel throughout the Project's construction. Project construction would last for approximately 2 years. The annual average fuel consumption would be approximately 41,511 gallons of gasoline and approximately 60,551 gallons of diesel fuel per year of construction.

For comparison purposes, the fuel usage during Project construction would represent less than 0.001 percent of the 2021 annual on-road gasoline-related energy consumption and 0.014 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix D of this SCEA.

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the USEPA Advanced Clean Truck standards for medium- and heavy-duty trucks for model years 2014–2018 (Phase 1) and through model year 2027 (Phase 2) that will improve fuel efficiency and cut carbon pollution and the CARB anti-idling regulation in accordance with Section 2485 in Title 13 of the CCR to reduce the inefficient, wasteful, and unnecessary consumption of energy, such as petroleum-based transportation fuels. While these regulations are intended to reduce construction emissions, compliance with the anti-idling

<sup>83</sup> The percentage is derived by taking the annual average amount of electricity usage during the Project construction (14,622 kWh) and dividing that number by the annual amount of total electricity usage during Project operation (2,578,529 kWh) to arrive at 0.57 percent.

<sup>84</sup> Los Angeles Department of Water and Power (LADWP), 2017 Final Power Integrated Resource Plan, Appendix A, 2017. Available at: [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased), accessed October 28, 2022.

and emissions regulations discussed above would also result in energy savings from the use of more fuel-efficient engines.

As discussed in the response to Checklist Question XIX.b, solid waste reduction programs help to reduce the number of trips to haul solid waste produced during the construction period, as well as reducing energy used to process solid waste. The City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). In compliance with these plans and policies, the Project would implement waste reduction measures, which include reducing construction-related solid waste generation through the recycling of construction and demolition debris and using recycled building materials for new construction.

Based on the available data, construction would utilize energy only for necessary on-site activities, to transport construction materials and demolition debris to and from the Project Site, and to transport excavated soil from the Project Site. As discussed above, idling restrictions and the use of cleaner, energy-efficient equipment would result in less fuel combustion and energy consumption and thus minimize the Project's construction-related energy use. Therefore, construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

### **Operation**

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, appliances, and an emergency generator. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in **Table 5-7, Summary of Annual Net New Energy Use During Project Operation**, the Project's net new energy demand would be approximately 2,096,402 kWh of electricity per year, 27,916 gallons of gasoline per year, and 9,406 gallons of diesel fuel per year. The Project would be all-electric. As such the Project would result in a net decrease of approximately 399,285 cubic feet (cf) of natural gas per year relative to the existing site natural gas usage from the existing creative office and warehouse uses, which would be removed as part of the Project.<sup>85</sup> This analysis assumes that the Project would not be allowed to use natural gas for domestic and pool water heating.

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<sup>85</sup> As per PDF GHG-1 and PDF GHG-2, the Project would eliminate all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered.

**TABLE 5-7**  
**SUMMARY OF ANNUAL NEW ENERGY USE DURING PROJECT OPERATION <sup>A,B</sup>**

<b>Energy Type</b>	<b>Annual Quantity</b>
<b>Electricity (kWh)</b>	
Existing Site (Office, Manufacturing, Parking Lot, Potable Water)	482,127
Project (Apartments, Amenities, Parking Structure, EV Charging, Potable Water)	2,578,529
<b>Total Net Electricity</b>	<b>2,096,402</b>
<b>Natural Gas (cf)</b>	
Existing Site	399,285
Project	N/A <sup>c</sup>
<b>Total Net Natural Gas</b>	<b>(399,285)</b>
<b>Transportation (gallons)</b>	
Existing Site:	
Gasoline	27,916
Diesel	4,158
Project:	
Gasoline	77,325
Diesel	13,565
<b>Total Net Transportation – Gasoline</b>	<b>49,409</b>
<b>Total Net Transportation – Diesel</b>	<b>9,406</b>

## NOTES:

<sup>a</sup> Detailed calculations are provided in Appendix D of this SCEA.

<sup>b</sup> Project electricity and natural gas estimates assume compliance with applicable 2019 Title 24 and CALGreen Code requirements.

<sup>c</sup> As per PDF GHG-1 and PDF GHG-2, the Project would eliminate all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered.

kWh = kilowatt-hours; cf = cubic feet; ( ) = negative value

SOURCE: ESA, 2022.

### *Electricity*

Once the Project is operational, there would be electrical usage from a variety of sources including electricity associated with the residential and commercial uses on-site, and off-site water and wastewater distribution and treatment. As mentioned previously, electricity transmission for the Project Site is provided by the LADWP. In order to properly assess and meet growing energy demands, the LADWP releases Integrated Resource Plans, the latest of which is the 2017 Final Power Strategic Long-Term Resource Plan and is a



comprehensive 20-year roadmap to assist LADWP to meet the growing energy demand from consumers in an environmentally responsible and cost effective manner.<sup>86</sup>

LADWP generates its load forecast based on multiple forms of data from various agencies, including historical sales from the General Accountings Consumption and Earnings report, historical Los Angeles County employment data provided from the State's Economic Development Division, plug-in electric vehicle (PEV) projections from the CEC account building permits when determining electricity Load Forecasts, solar rooftop installations from the Solar Energy Development Group, electricity price projections from the Financial Services organization, and LADWP program efficiency forecasts.<sup>87</sup> In addition, LADWP considers projected Los Angeles County building permit amounts calculated by the UCLA Anderson School of Management when determining its load forecast and would therefore account for the Project's electricity demand.<sup>88</sup>

The California Renewable Portfolio Standard (RPS) requires that the percentage of renewable sources procured by LADWP be increased to at least 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030. LADWP's current sources include wind, solar, and geothermal sources. These sources accounted for 36.7 percent of LADWP's overall energy mix in 2020, the most recent year for which data are available, and represent the currently available overall off-site renewable sources of energy that would meet the Project's energy demand.<sup>89</sup>

As a result, in 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy load in the 2026-2027 fiscal year (the Project's buildout year) would be 23,807 GWh of electricity.<sup>90, 91</sup> As such, the Project-related net increase in annual electricity consumption of 2.09 GWh per year would represent approximately 0.009 percent of LADWP's projected energy load for 2026-2027 and, therefore, would be within LADWP's projected electricity supplies. LADWP has provided a will serve letter indicating that electrical power services are available and can serve the Project.<sup>92</sup> As discussed above, the Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Code of Regulations. The Project would also be required to comply with the L.A. Green Building Code, which incorporates by reference

<sup>86</sup> LADWP, Power Strategic Long-Term Resource Plan, 2017, December 2017, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?\\_adf.ctrl-state=8cgzcbjy\\_29&\\_afLoop=49006793465557](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=8cgzcbjy_29&_afLoop=49006793465557), accessed October 28, 2022.

<sup>87</sup> LADWP, Power Strategic Long-Term Resource Plan, 2017, December 2017, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?\\_adf.ctrl-state=8cgzcbjy\\_29&\\_afLoop=49006793465557](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=8cgzcbjy_29&_afLoop=49006793465557), accessed October 28, 2022.

<sup>88</sup> LADWP, Power Strategic Long-Term Resource Plan, 2017, December 2017, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?\\_adf.ctrl-state=8cgzcbjy\\_29&\\_afLoop=49006793465557](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrl-state=8cgzcbjy_29&_afLoop=49006793465557), accessed October 28, 2022.

<sup>89</sup> California Energy Commission, Utility Annual Power Content Labels for 2020, Los Angeles Department of Water and Power, <https://www.energy.ca.gov/filebrowser/download/3872>, accessed October 28, 2022.

<sup>90</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>91</sup> LADWP, 2017 Final Power Strategic Long-Term Resource Plan, p. A-6, 2017.

<sup>92</sup> Will Serve Letter received from Marco Maldonado on July 22, 2022. Included in Appendix L of this SCEA.

the CALGreen Code. The L.A. Green Building Code requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the L.A. Green Building Code requires projects to achieve a 20 percent reduction in wastewater generation. To comply, the Project would include energy conservation features. Specifically, the residential units would include energy efficient lighting fixtures, ENERGY STAR-rated appliances, low-flow water features, and energy efficient mechanical heating and ventilation systems.

The Project would provide approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements. Additionally, LADWP has confirmed the availability of electric service for the Project. Therefore, with the incorporation of these measures and features, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity.

### *Natural Gas*

As per PDF GHG-1 and PDF GHG-2, the Project would virtually eliminate nearly all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered. Therefore, with the incorporation of these project design features, operation of the Project would virtually eliminate nearly all on-site natural gas combustion and the Project would not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

### *Transportation Energy*

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the residence or for commercial needs at the Project Site. A majority of the vehicle fleet that would be used by Project employees and guests would consist of light-duty automobiles and light-duty trucks, which are subject to federal fuel efficiency standards. Annual trips for the Project were estimated using trip rates provided in the Project's Transportation Assessment.<sup>93</sup> The Project includes conservation measures and design features that would decrease consumption of petroleum-based fuels. The Project is a mixed-use development located in a TPA, in an infill location close to commercial and other service uses. As an infill development located near transit and other services, a number of trips would be expected to be transit or walking/bicycle trips rather than vehicle trips. Some residents would take transit to their destinations or would walk to commercial uses and other services nearby. The Project Site is located within 0.5 mile of public transportation opportunities. As discussed in Chapter 2, *Project Description*, and Chapter 3, *SCEA Criteria and TPP Consistency Analysis*, the Project Site is located within a designated TPA and a HQTA. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. The expected reduction in

<sup>93</sup> Gibson Transportation Consulting, Inc., Transportation Assessment for the 4112 Del Rey Avenue Residential Project, October 2022. Refer to Appendix K of this SCEA.

vehicle trips due to the Project features discussed above would therefore decrease the Project's consumption of petroleum-based fuels.

In addition, the Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code. The Project would provide 142 bicycle parking spaces in compliance with LAMC requirements.

As reported in Table 5-7, the Project's estimated net increase in petroleum-based fuel usage during operation would be approximately 49,904 gallons of gasoline and 9,406 gallons of diesel per year, or a total of 58,815 gallons of petroleum-based fuels annually. Based on the California Energy Commission's (CEC) California Annual Retail Fuel Outlet Report, Los Angeles County consumed 3.06 billion gallons of gasoline and 0.45 billion gallons of diesel fuel in 2021.<sup>94</sup> Thus, for comparison purposes, the transportation-related net fuel usage for the Project would represent approximately 0.002 percent of the annual on-road gasoline- and 0.002 percent of the County's annual on-road diesel-related energy consumption in Los Angeles County. Detailed calculations are shown in Appendix D of this SCEA.

***(ii) The effects of the Project on local and regional energy supplies and on requirements for additional capacity.***

***Construction***

As discussed above, electricity would be intermittently consumed for conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. As discussed above, the Project's estimated net annual average construction electricity usage represents approximately 0.57 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. As discussed above, since construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas, the Project construction would create no demand for natural gas, and natural gas would not be supplied to support Project construction activities. Additionally, as previously discussed, transportation fuel usage during Project construction activities would be approximately 0.001 percent of the 2021 annual on-road gasoline-related energy consumption and 0.014 percent of the 2021 annual on-road diesel fuel-related energy consumption in Los Angeles County. As energy consumption during Project construction activities would be relatively low, the Project would not adversely affect

<sup>94</sup> California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010-2021, <https://www.energy.ca.gov/media/3874>, accessed October 28, 2022. Diesel is adjusted to account for retail (50.3 percent) and non-retail (49.7 percent) diesel sales.

regional energy supplies in the years during the construction period. Construction transportation energy would be provided by existing retail service stations and from existing mobile fuel services that are typically needed to deliver fuel to a construction site to refuel the off-road construction equipment at the Project Site and no new facilities would be expected to be required.

### **Operation**

As discussed above, LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.<sup>95</sup> Based on LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout year) would be 23,807 GWh of electricity.<sup>96</sup> Based on LADWP's projected sales for the 2026-2027 fiscal year (the Project's buildout year), it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's net increase in annual electricity consumption of 2,096,402 kWh per year, which would represent approximately 0.009 percent of LADWP's projected sales.

As stated above, the Project would not result in a net increase in demand for natural gas. Accordingly, the Project would not result in natural gas demand that would exceed Southern California Gas Company's (SoCalGas) projected total capacity, and SoCalGas would be capable of meeting the Project's incidental demand. The Project would represent an insubstantial percentage of SoCalGas' capacity and the Project would not require SoCalGas to increase its capacity to the service area.

At buildout, the Project would consume a net increase of 49,904 gallons of gasoline and 9,406 gallons of diesel per year, or a total of 58,815 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.002 percent of the 2021 annual on-road gasoline- and 0.002 percent of the 2021 annual on-road diesel-related energy consumption in Los Angeles County.<sup>97</sup> Transportation fuels (gasoline and diesel) are produced from crude oil, which can be domestic or imported from various regions around the world. Based on current petroleum production and consumption and future trends, oil production and consumption will grow through 2050. Crude oil supply and utilization in the United States is expected to return to pre-pandemic levels starting in 2023 and stabilize in the long term and therefore would be sufficient to sustain the projected oil consumption through 2050.<sup>98</sup> Detailed calculations are shown in Appendix D of this SCEA.

<sup>95</sup> LADWP, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, p. 14.

<sup>96</sup> LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

<sup>97</sup> California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2010-2021, <https://www.energy.ca.gov/media/3874>, accessed October 28, 2022. Diesel is adjusted to account for retail (50.3 percent) and non-retail (49.7 percent) diesel sales.

<sup>98</sup> United States Energy Information Administration, Annual Energy Outlook 2022, March 3, 2022. Available online at: <https://www.eia.gov/outlooks/aeo/>.

In sum, energy consumption during Project operations would be relatively insubstantial and energy requirements are within LADWP's and SoCalGas' service provision and planning efforts. Operational transportation energy would be provided by existing retail service stations and no new retail service stations would be expected to be required.

***(iii) The effects of the Project on peak and base period demands for electricity and other forms of energy.***

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.<sup>99</sup> The LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2026-2027, the base case peak demand for the power grid is 6,129 MW.<sup>100</sup> Under peak conditions, the Project would consume a total of 2,578,529 kWh on an annual basis (or a net of 2,096,402 kWh), which is equivalent to a maximum instantaneous peak demand of approximately 588 kW (assuming 4,380 hours per year of active electricity demand). In comparison to the LADWP power grid forecasted base peak load of 6,129 MW for 2026-2027, the Project would represent approximately 0.0096 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of between 0.7 and 0.9 percent annually between 2022 and 2026 would be sufficient to account for future electrical demand by the Project.<sup>101</sup> Therefore, the Project's electrical consumption during operational activities would have a negligible effect on peak load conditions of the power grid and is consistent with existing and planned demand.

***(iv) Effects of the Project on Energy Resources***

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP 2017 Power Strategic Long-Term Resource Plan identifies adequate resources (natural gas, coal) to support future generation capacity, and, as discussed above, LADWP's existing and planned electricity capacity and supplies would be sufficient to serve the Project's electricity demand.<sup>102</sup> Senate Bill (SB) 350 includes requirements for utility providers to increase the procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of its energy portfolio from renewable sources by 2030. The current sources of LADWP's renewable energy include wind, solar, and geothermal sources. These sources account for 36.7 percent of LADWP's overall energy

<sup>99</sup> LADWP, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, p. A-6, [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased), accessed October 28, 2022.

<sup>100</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. A-6.

<sup>101</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, p. A-6.

<sup>102</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, p. ES-25, 2017. "the 2017 SLTRP outlines an aggressive strategy for LADWP accomplish its goals, comply with regulatory mandates, and provide sufficient resources over the next 20 years given the information presently available"

mix in 2020, which is the most recent year for which data is available.<sup>103</sup> Wind, solar, and geothermal represent the available off-site renewable sources of energy that would meet the Project's energy demand. LADWP has committed to providing an increasing percentage of its energy portfolio from renewable sources so as to exceed the Renewables Portfolio Standard requirements, by increasing to 50 percent by 2025 (5 years before the 2030 requirement), 55 percent by 2030, and 65 percent by 2036.<sup>104</sup> The Project would not conflict with LADWP's ability to procure the required amount of renewable energy, as the Project's net energy consumption is less than 0.01 percent of LADWP's forecasted supply.

With regard to on-site renewable energy sources, the Project would meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Code. Due to the Project Site's location, on-site renewable energy sources other than photovoltaic panels would not be feasible as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.<sup>105</sup> However, with compliance with the applicable codes, including the inclusion of approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements, the Project would support renewable energy.

As discussed above, natural gas supplied to the Southern California area is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States, as well as Canada.<sup>106</sup> According to the U.S. Energy Information Administration (EIA), the United States currently has approximately 84 years of natural gas reserves based on 2019 consumption.<sup>107</sup> As per PDF GHG-1 and PDF GHG-2, the Project would eliminate all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered. For the reasons stated above, Project construction and operation activities would have no effect on natural gas supply.

As stated earlier, transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world. Based on current petroleum production and consumption and future trends, oil production

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<sup>103</sup> California Energy Commission, Utility Annual Power Content Labels for 2020, Los Angeles Department of Water and Power.

<sup>104</sup> LADWP, 2017 Power Strategic Long-Term Resource Plan, p. ES-3, 2017.

<sup>105</sup> California Energy Commission, California Wind Resource Potential.

<sup>106</sup> California Gas and Electric Utilities, 2020 California Gas Report, 2020.

<sup>107</sup> U.S. Energy Information Administration. *How much natural gas does the United States have, and how long will it last?* Updated March 7, 2022, <https://www.eia.gov/tools/faqs/faq.php?id=58&t=8>, accessed October 28, 2022.

and consumption will grow through 2050. Crude oil supply and utilization in the United States is expected to return to pre-pandemic levels starting in 2023 and stabilize in the long term and therefore would be sufficient to sustain the projected oil consumption through 2050.<sup>108</sup> The Project would comply with Corporate Average Fuel Economy (CAFE) standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel efficiency to reduce fuel consumption. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

Given the evidence presented above, the Project would minimize construction and operational energy (electricity and natural gas) and transportation fuel demand to the extent feasible and would not substantially impact energy resources. Therefore, construction and operation of the Project would not have a significant impact on energy resources.

***(v) The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.***

As discussed in Section VIII, Greenhouse Gas Emissions, and Section XI, Land Use and Planning, of this SCEA, the 2020-2045 RTP/SCS (referred to herein as Connect SoCal 2020) presents the transportation vision for the region through the year 2045 and provides a long-term investment framework for addressing the region's transportation and related challenges.<sup>109</sup> As discussed in detail in the response to Checklist Question VIII.b, the Project's design and its characteristics would be consistent with and support the goals of Connect SoCal 2020. The Project represents an infill development within a TPA and HQTAs as it is located within 0.5 mile of public transportation opportunities. As discussed in Chapter 2, *Project Description*, and Chapter 3, *SCEA Criteria and TPP Consistency Analysis*, the Project Site is located within a designated TPA and HQTAs. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. In addition, the Project would also provide up to 142 on-site bicycle parking spaces, consistent with the requirements of the LAMC. The Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code. The Project Site location and Project design would be consistent with regional plans to improve transportation efficiency. These measures would further promote a reduction in VMT.

As a result, operation of the Project would encourage and result in reduced transportation energy and provide residents, employees, and visitors with multiple convenient alternative

<sup>108</sup> United States Energy Information Administration, 2022. Annual Energy Outlook 2022, March 3, 2022. Available online at: <https://www.eia.gov/outlooks/aeo/>.

<sup>109</sup> Southern California Association of Governments (SCAG), Connect SoCal 2020, September 2020, <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>, accessed August 29, 2022.

transportation options. Therefore, the Project encourages the use of efficient transportation energy use and efficient transportation alternatives.

### **Conclusion**

Based on the above impact analysis, the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project's energy usage during peak and base periods would also be consistent with electricity, natural gas, and transportation fuel future projections for the region. During operations, the Project would comply with existing minimum energy efficiency requirements such as the applicable Title 24 standards and CALGreen Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation, and would not cause wasteful, inefficient, and unnecessary consumption of energy. No mitigation measures would be required.

### **b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact.** As demonstrated in the analysis below, construction and operation of the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The Project would not result in an increase in demand for electricity, natural gas, or transportation energy that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

#### ***(i) Whether the Project conflicts with adopted energy conservation plans***

The project would comply with applicable State and local energy conservation plans and policies. A detailed discussion of the Project's comparison with the applicable actions and strategies in the L.A.'s Green New Deal is provided in in the response to Checklist Question VIII.b. As discussed, the Project is designed in a manner that is not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code, which have been incorporated into the Los Angeles Green Building Code, to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). In addition to compliance with the Los Angeles Green Building Code, the Project would incorporate energy and water conservation measures beyond City requirements as specified in PDF GHG-1 and PDF GHG-2.

The Project would also be consistent with and not conflict with regional planning strategies that address energy conservation. As discussed above and in Section VIII, Greenhouse Gas Emissions, as well as Section XI, Land Use and Planning, of this SCEA, Connect SoCal 2020 focuses on creating livable communities with an emphasis on



sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, Connect SoCal 2020 focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project's design, its increase in density on an infill site within a designated TPA and HQTA in proximity to transit, its proximity to existing off-site retail, restaurant, entertainment, commercial, and job destinations, and its walkable environment would achieve a reduction in VMT. These land use characteristics are included in the transportation fuel demand for the Project's mobile sources. Additional detailed information regarding these land use characteristics are provided in the response to Checklist Question III.a and VIII.b.

As a result, the Project would implement project design features and incorporate water conservation, energy conservation, landscaping, and other features consistent with applicable actions and strategies in the L.A.'s Green New Deal (Sustainable City pLAn 2019), including features that go beyond those specified by regulations such as the City's Green Building Ordinance such as the design features specified in PDF GHG-1 and PDF GHG-2 (refer to Section VIII, Greenhouse Gas Emissions). Therefore, the Project would not conflict with energy conservation plans and impacts would be less than significant.

***(ii) The degree to which the Project complies with existing energy standards***

Construction equipment would comply with federal, State, and regional requirements where applicable. With respect to truck fleet operators, the USEPA and NHSTA have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.<sup>110</sup> The USEPA and National Highway Traffic Safety Administration (NHTSA) also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.<sup>111</sup> The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect

<sup>110</sup> United States Environmental Protection Agency, Fact Sheet: EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles, August 2011, <https://nepis.epa.gov/Exe/ZyNET.exe/P100BOT1.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2011+Thru+2015&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C11thru15%5CTxt%5C00000000%5CP100BOT1.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=h pfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL#>, accessed October 28, 2022.

<sup>111</sup> United States Environmental Protection Agency, Federal Register/Vol. 81, No. 206/Tuesday, Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, October 25, 2016.

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

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

Electricity and natural gas usage during Project operations, as reported in Table 5-7, would be minimized through incorporation of applicable Title 24 standards, applicable CALGreen Code requirements, and the Los Angeles Green Building Code. Furthermore, the Project incorporates energy-conservation measures beyond regulatory requirements, such as those specified in PDF AIR-1, PDF GHG-1, and PDF GHG-2. Therefore, Project construction and operational activities would comply with existing energy standards with regards to energy usage.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with CAFE standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project operational activities would comply with existing energy standards with regards to transportation fuel consumption. Thus, based on the information above, construction and operation of the Project would comply with existing energy standards.

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

The current Los Angeles Green Building Code requires compliance with the applicable Title 24 standards with the addition of the CALGreen Code, which contain more stringent provisions than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). As detailed in Section VIII, Greenhouse Gas Emissions, the Project would comply with the Los Angeles Green Building Code to reduce GHG emissions by increasing energy-efficiency beyond requirements, reducing indoor and outdoor water demand, and complying with the Title 24 Building Energy Efficiency Standards, as amended by the City. As per PDF GHG-1 and PDF GHG-2, the Project would not include fireplaces in the residential units and would be designed with all electric-powered buildings with no natural gas infrastructure, eliminating all on-site natural gas combustion. In compliance with the

City's Green Building Code, the Project would incorporate energy efficient appliances, water conservation features such as low flow water fixtures, and water-efficient landscaping techniques by planting native and drought-tolerant plant species. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency by reducing heat loss and heat gain in the building envelope.

As discussed above, the City has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Integrated Resources Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986).<sup>112, 113</sup> These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

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

## **Cumulative Impacts**

### ***Electricity***

The Project, in conjunction with the related projects, could result in a net increased demand for electricity supplies. LADWP's 2017 Strategic Long-Term Resource Plan (SLTRP) serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost-effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Thus, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030.

Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City's

<sup>112</sup> City of Los Angeles, Solid Waste Integrated Resources Plan, 2014, <https://www.lacitysan.org/san/sandocview?docname=cnt012520>, accessed October 28, 2022.

<sup>113</sup> City of Los Angeles, Exclusive Franchise System Ordinance, 2014. <https://cityclerk.lacity.org/councilagenda/AttachmentViewer.ashx?AttachmentID=38690&ItemID=40266>, accessed October 28, 2022.

Green Building Code. Compliance with Title 24 energy conservation standards, City's Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Additionally, as discussed above, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources accounted for 30 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available. This represents the available off-site renewable sources of energy that could meet the Project's and related projects energy demand. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of electricity. Therefore, cumulative impacts related to electricity would be less than significant.

### ***Natural Gas***

The Project does not include the use of natural gas and therefore, the Project, in conjunction with the related projects, would not result in a net increased demand for natural gas supplies. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas's ability to serve each related project. Additionally, compliance with energy conservation standards pursuant to Title 24 would reduce cumulative demand for natural gas resources. As such, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient and unnecessary use of natural gas. Therefore, cumulative impacts related to natural gas would be less than significant.

### ***Transportation Energy***

The Project, in conjunction with the related 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 related 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 related 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.

## VII. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The analysis is based on the information provided in the *Geotechnical Investigation Report* (Geotechnical Report) prepared by Twining Consulting in August 2022, and contained in Appendix E, and the *Paleontological Resources Assessment Report, 4112 Del Rey SCEA Project, City of Los Angeles, California* (Paleontological Resources Assessment) prepared by ESA in October 2022, and contained in Appendix F of this SCEA.

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

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

**Less than Significant Impact.** A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zones. Based on criteria established by the California Geologic Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

The Project Site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Report prepared for the Project indicates that no currently known active or potentially active surface faults traverse the Project Site, and that the Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.<sup>114</sup> The nearest known active faults to the Project Site are the Santa Monica Fault, located approximately 3.2 miles to the north, and the Newport-Inglewood Fault, located approximately 4.4 miles to the east. As such, the potential for surface rupture due to faulting occurring on the Project Site during the design life of the Project is considered low. Furthermore, the proposed building would be designed and

<sup>114</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

constructed to resist the effects of seismic ground motions as provided in the City's current Building Code, which incorporates the Uniform Building Code (UBC) and the 2019 California Building Code (CBC). Therefore, the Project would not directly or indirectly cause potential substantial adverse impacts associated with the rupture of a known earthquake fault. Impacts would be less than significant, and no mitigation measures would be required.

***(ii) Strong seismic ground shaking?***

**Less than Significant Impact.** As discussed in the response to Checklist Question VII.a.i, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and was concluded to have a low potential for surface rupture beneath the Project Site.<sup>115</sup> However, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The nearest known active faults to the Project Site are the Santa Monica Fault, located approximately 3.2 miles to the north, and the Newport-Inglewood Fault, located approximately 4.4 miles to the east. The Project would be required to comply with the existing building, grading, and seismic regulations of the City's current Building Code, which incorporates the UBC and CBC. Furthermore, the City's Building Code requires the submittal and approval of a design-level geotechnical report for the Project that would incorporate the building construction and design recommendations contained in the Geotechnical Report prepared for the Project. Therefore, the Project would not expose people or structures to substantial adverse effects associated with strong seismic ground-shaking. Thus, the Project's impacts associated with seismic ground-shaking would be less than significant, and no mitigation measures would be required.

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

**Less than Significant Impact.** Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid. As discussed in the Geotechnical Report, the Project Site is located within a liquefiable area mapped by the City and also within a state-designated Zone of Required Investigation for Liquefaction, according to the California Seismic Hazard Zones Map. As such, a liquefaction analysis was conducted for the Project Site, considering the existing conditions below with potentially liquefiable soils and with the highest historic groundwater elevation at a depth of 6 feet below ground surface (bgs). The Geotechnical Report found that liquefaction is likely to occur at the Project Site in layers between 6 and 13 feet bgs and between 17 and 23 feet bgs. In addition, it is estimated that the amount of total liquefaction-induced and

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<sup>115</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

dry soil settlement possible for the design conditions is up to approximately 2 inches, and a differential settlement of approximately 1 inch.<sup>116</sup> Accordingly, the Geotechnical Report recommends that the Project's foundation be designed to account for such seismically induced settlements. Furthermore, the Applicant would be required to design and construct the Project in conformance with the most recently adopted LAMC, applicable recommendations made in the Geotechnical Report prepared for the Project, and any updates made in the final design-level geotechnical report that is required to be prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life associated with liquefaction. The Project would not exacerbate the existing potential for liquefaction. Therefore, Project impacts related to liquefaction would be less than significant.

#### ***(iv) Landslides?***

**Less than Significant Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. According to the Geotechnical Report prepared for the Project, the Project Site is relatively flat, and the surrounding areas are fully developed and generally characterized by gently sloping topography that would not be susceptible to landslides. In addition, the Project Site is not located within a landslide area mapped by the City or within a Zone of Required Investigation for Earthquake-Induced Landslides designated by the State of California.<sup>117</sup> There are no known landslides adjacent to the Project Site and the Project Site is not in the path of any known or potential landslides.<sup>118</sup> Therefore, the potential for slope stability hazards to adversely affect the Project is considered low. The Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides. Impacts would be less than significant, and no mitigation measures would be required.

#### **b. Result in substantial soil erosion or the loss of topsoil?**

**Less than Significant Impact.** A project would have a significant impact related to geology and soils if it would result in substantial soil erosion or the loss of topsoil. During construction, soil disturbance would temporarily occur during earth-moving activities, such as excavation and trenching for foundations and utilities, soil compaction, and grading. Disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via stormwater runoff from the Project Site. However, the Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Project Site. In addition, construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the LAMC, CBC, and requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent

<sup>116</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

<sup>117</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

<sup>118</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.



with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

Following Project construction, the Project Site would be similar to existing conditions and return to a mostly impervious state (i.e., minimal exposed soils) with pervious areas consisting of only landscaped areas. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant. No mitigation measures would be required.

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

**Less than Significant Impact.** As discussed in the response to Checklist Question VII.a.iii, it is estimated that the amount of total liquefaction-induced and dry soil settlement possible for the design conditions is up to approximately 2 inches, and a differential settlement of approximately 1 inch. Accordingly, the Geotechnical Report recommends that the Project's foundation be designed to account for such seismically induced settlements. Furthermore, the Applicant would be required to design and construct the Project in conformance with the most recently adopted LAMC, applicable recommendations made in the Geotechnical Report prepared for the Project, and any updates made in a final design-level geotechnical report that is required to be prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life associated with liquefaction. The Geotechnical Report prepared for the Project did not identify any issues related to lateral spreading, subsidence, or collapse. Therefore, the Project would not 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. Impacts would be less than significant, and no mitigation measures would be required.

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

**Less than Significant Impact.** Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil

expansion can damage structures by cracking foundations, causing settlement, and distorting structural elements. The Project Site is underlain by undocumented fill and alluvial sediments consisting of gravel, sand, and clay. The undocumented fill is characterized as sandy lean clay and sandy silt, and the alluvial sediments are characterized as medium stiff to very stiff sandy lean clay and lean clay with sand bedded with medium dense silty sand in the upper 23 feet underlain by dense to very dense silty sand and poorly graded sand with silt to the maximum exploration depth at approximately 51.5 feet bgs.<sup>119</sup> As described in Table B-4 of the Geotechnical Report, soils at the Project Site have a low expansion potential. In addition, pursuant to the City's Building Code, which adopts the 2019 CBC, and applicable regulations, design and construction of the Project would be required to incorporate the recommendations from the Geotechnical Report to protect against risks associated with expansive soils. These measures include compliance with the City's building permit requirements and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a required design-level geotechnical report containing the recommendations of the existing Geotechnical Report. Therefore, impacts associated with being located on expansive soils would be less than significant, and no mitigation measures would be required.

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

**No Impact.** The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and no mitigation measures would be required.

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

**Less than Significant with Mitigation Incorporated.** A database search from the Natural History Museum of Los Angeles County (LACM) for records of fossil localities in and around the Project Site demonstrated that there are no records of fossils previously identified within the Project area. The same search identified six localities at distances of between 0.35 and 4.6 miles from the Project Site that yielded Pleistocene fossils from terrestrial and one marine setting. However, these fossil localities are associated with uplifted regions of Pleistocene alluvium and are not directly relevant to the geological setting of the Project area.

The Project area is mapped on the Dibblee and Minch (2007) 1:24,000 geological map. The entire Project Site is underlain by Quaternary alluvium, composed of mixed sedimentary rocks of clay, sand and gravels. Uplifted areas of older alluvium are found to

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<sup>119</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

the southeast, east, and northwest of the Project area. More detailed mapping of the Quaternary units by Castle (1960) also shows the Project area underlain by young Quaternary alluvium bounded to the south by Quaternary floodplain deposits.

As stated in the *Paleontological Resources Assessment* (Appendix F), based on the museum records search and additional information as well as guidance from the Society for Vertebrate Paleontology (SVP), the Project Site is considered to have a “low paleontological sensitivity.” This recommendation is based on the age of the alluvium (Holocene) and the predicted depth of construction. However, because subsurface geology is, by its nature, unknown, there may be a potential for the discovery of unanticipated resources if older Pleistocene alluvium is impacted. As impacts to previously unknown buried paleontological resources would be potentially significant, the following mitigation measures, based on the SVP procedural guidelines, are provided in order to reduce impacts to paleontological resources to a less-than-significant level under CEQA.

### *Mitigation Measures*

**MM GEO-1:** Prior to any Project ground disturbance activities, a qualified paleontologist shall be retained by the Applicant to prepare a Worker’s Environmental Awareness Program (WEAP) and train all construction personnel prior to the start of any construction activities. The WEAP training shall include, at a minimum, the following information:

- Review of local and State laws and regulations pertaining to paleontological resources;
- Types of fossils that could be encountered during ground disturbing activity;
- Photos of example fossils based on the regional LACM collections that could occur on site for reference; and
- Instructions on the procedures to be implemented should unanticipated fossils be encountered during construction, including stopping work in the vicinity of the find and contacting a qualified professional paleontologist.

**MM GEO-2:** In the event an unanticipated fossil discovery is made during ground disturbing activities, construction activities shall halt in the immediate vicinity of the fossil, and the qualified professional paleontologist retained by the Applicant shall be notified to evaluate the discovery, determine its significance, and evaluate whether additional mitigation or treatment is warranted. Work in the area of the discovery shall resume once the find is properly documented and authorization is given by the qualified paleontologist to resume construction work. Any significant paleontological resources found shall be prepared, identified, analyzed, and permanently curated in an approved regional museum repository.

### **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, cumulative geotechnical impacts related would be less than significant.

## VIII. Greenhouse Gas Emissions

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

The analysis is based on the information provided in the Project-specific GHG emissions modeling worksheets contained in Appendix G of this SCEA.

- 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?**

**Less than Significant Impact.** CEQA Guidelines Section 15064.4 provides guidance to lead agencies for determining the significance of impacts from GHG emissions. Section 15064.4(a) provides that a lead agency shall make a good-faith effort based, to the extent possible, on scientific and factual data to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Section 15064.4(a) further provides that a lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project and/or (2) to rely on qualitative analysis or performance-based standards.

CEQA Guidelines Section 15064.4(b) also provides that, when assessing the significance of impacts from GHG emissions, a lead agency should focus the analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change and consider a timeframe that is appropriate for the project. The lead agency’s analysis should reasonably reflect evolving scientific knowledge and State regulatory schemes, and consider (1) the extent to which the project may increase or

reduce GHG emissions compared with existing conditions, (2) whether the project's GHG 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. The analysis of the potential impacts from the Project's GHG emissions follows this approach.

The CEQA Guidelines do not provide numeric or qualitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of the significance of GHG emissions up to the lead agency and authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (CEQA Guidelines Sections 15064.7[b] and 15064.7[c]). CEQA Guidelines Section 15064(h)(3) allows a lead agency to reach a less-than-significant conclusion for GHG emissions if the project complies with a program and/or other regulatory scheme to reduce GHG emissions. The City has not adopted a threshold with supporting analysis setting forth approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. Additionally, although the City prepared its Sustainable City pLAN in 2015, followed by the update in 2019, these plans do not adopt thresholds of significance and otherwise do not meet the criteria established under CEQA Guidelines Section 15183.5(b) to be considered as qualified GHG reduction plans. Furthermore, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects).

In the absence of quantitative GHG thresholds and/or a qualified GHG reduction plan for use by a project to tier or streamline its environmental analysis, CEQA provides that a lead agency may find that a less-than-significant GHG impact would result if it is determined that the project is consistent with statewide, regional and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.

Therefore, in the absence of any adopted quantitative threshold and in accordance with case law and the CEQA Guidelines, the City, as the lead agency, has determined that the Project would not have a significant effect on the environment if the Project is found to be consistent with applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's 2017 and 2022 Climate Change Scoping Plan, Connect SoCal 2020, and the City's Sustainable City pLAN and Green Building Code.

Note that GHGs and climate change are exclusively cumulative impacts; there are no non-cumulative GHG emissions impacts from a climate change perspective.<sup>120</sup> Therefore, in accordance with the scientific consensus regarding the cumulative nature

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<sup>120</sup> California Air Pollution Control Officers Association, CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act.

of GHGs, the analysis herein analyzes the cumulative contribution of Project-related GHG emissions.

### **Greenhouse Gases**

State-regulated GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). CO<sub>2</sub> is the most abundant GHG in the atmosphere. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources. California law and the CEQA Guidelines contain a similar definition of GHGs (Health and Safety Code Section 38505(g); 14 CCR Section 15364.5). The primary GHGs of concern associated with the Project are CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O.

Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in their equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. These GHG emissions are calculated by converting the pollutant-specific emissions to CO<sub>2</sub>e emissions by applying the proper global warming potential (GWP) value. These GWP values are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report (AR4)*.<sup>121</sup> The AR4 GWP values are consistent with those used in CARB's most recent GHG inventory and the 2017 and 2022 Climate Change Scoping Plan. By applying the GWP values, project related CO<sub>2</sub>e emissions can be tabulated in MT per year.

### **CEQA Streamlining SB 375**

Section 21159.28 was one of the sections that SB 375, enacted in 2008, added to the PRC. Section 21159.28 provides that residential and mixed-use projects that meet certain criteria are eligible for CEQA streamlining, provided that CARB has accepted the Metropolitan Planning Organization's determination that the project area's SCS achieves the GHG emission reduction targets established by CARB for the region. PRC Section 21159.28 establishes the following eligibility criteria for CEQA streamlining:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in Section 21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.
- The project must incorporate the mitigation measures required by an applicable prior environmental document.

In cases where a project meets all criteria under Section 21159.28, the project would qualify for SB 375 CEQA Streamlining whereby no environmental analysis is required of: (1) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network or (2) growth-

<sup>121</sup> Intergovernmental Panel on Climate Change Fourth Assessment Report: The Physical Science Basis, Summary for Policy Makers, 2007, <https://www.ipcc.ch/report/ar4/wg1/>, accessed October 28, 2022.

inducing impacts. As discussed in Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, the Project has been determined to meet the criteria of Section 21159.28 for CEQA streamlining benefits. As such, no analysis of GHG emission impacts resulting from passenger cars and light-duty trucks associated with the Project is required (see Section 3, SCEA Criteria and Transit Priority Project Consistency Analysis, of this SCEA for the detailed analysis demonstrating that the Project meets the requirements of SB 375).

For the purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions, occurring both on- and off- the Project Site, resulting from Project-related incremental (net) increase in the use of on-road mobile vehicles (excluding passenger cars and light-duty trucks), electricity, natural gas, stationary sources, wastewater and solid waste generation compared to existing conditions. CEQA Guidelines Section 15126.2 requires a lead agency to assess the impact of a proposed project by evaluating “changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.” Consistent with CEQA Guidelines Section 15126.2, the Project’s GHG emissions are assessed by considering the changes to the existing setting as of the time the environmental analysis commenced. The SCAQMD’s *Draft Guidance Document* uses the term “incremental” throughout, which has the same meaning as a Project’s “net” change in GHG emissions.<sup>122</sup> Therefore, it is clear that the analysis of the Project’s net GHG emissions is an appropriate comparison metric, supported by substantial evidence, and consistent with CEQA Guidelines Section 15126.2.

This analysis includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, solid waste handling, and an emergency generator. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO<sub>2e</sub> metric, the GWP ratios corresponding to the global warming potential of CO<sub>2</sub> over a 100-year period is used in this analysis.

### **Project Design Features**

The Project would implement the following project design features that will minimize GHG emissions:

**PDF GHG-1:** The Project’s residential units will not include fireplaces.

**PDF GHG-2:** The Project buildings will not include natural gas infrastructure and will be all electric-powered.

<sup>122</sup> South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, 2008, Appendix E, p. 2-6. Available at: [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2), accessed October 28, 2022.

## Construction

Construction of the Project would generate GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Site. GHG emissions are estimated using the CalEEMod (Version 2020.4.0), which is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>123</sup> GHG emissions from on-road mobile sources, excluding passenger vehicles and light-duty trucks, were estimated outside of CalEEMod to account for EMFAC2021 because EMFAC2017 has not yet been incorporated in the current version of CalEEMod.

Construction emissions are estimated based on conservative assumptions regarding construction activities (e.g., assuming all construction occurs at the earliest feasible date, and that all construction equipment required for a particular construction phase is operating concurrently) and applying the mobile source emissions factors. The input values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule provided by the Project Applicant. When information was unknown, CalEEMod defaults were used. These values were then applied to the same construction phasing assumptions as were used in the criteria pollutant analysis (refer to response to Checklist Threshold III.b) to generate GHG emissions values for each construction year. These values are reported in units of MT for consistency with general State, federal, and global GHG emission inventories. The CO<sub>2e</sub> emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions from Project construction and operation as compared to the existing setting. The SCAQMD guidance, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, recognizes that construction-related GHG emissions from projects “occur over a relatively short-term period of time” and that “they contribute a relatively small portion of the overall lifetime project GHG emissions.”<sup>124</sup> Thus, in accordance with SCAQMD guidance, GHG emissions from construction have been amortized (i.e., averaged annually) over the lifetime of the Project. The SCAQMD defines the lifetime of a project as 30 years.<sup>125</sup>

<sup>123</sup> South Coast Air Quality Management District, 2017, California Emissions Estimator Model, <http://www.aqmd.gov/caleemod/>, accessed October 28, 2022.

<sup>124</sup> South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, 2008, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2), accessed October 28, 2022.

<sup>125</sup> SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, p. 5.



Therefore, the Project's total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions. Construction emissions are summarized in **Table 5-8, Construction Greenhouse Gas Emissions**

**TABLE 5-8  
PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS**

Emission Source	CO <sub>2</sub> e (Metric Tons) <sup>a,b</sup>
Construction Year 2024	359
Construction Year 2025	654
Construction Year 2026	353
<b>Total Construction Emissions</b>	<b>1,366</b>
<b>Amortized Construction Emissions (30-years)</b>	<b>46.5</b>

<sup>a</sup> Totals may not add up exactly due to rounding in the modeling calculations. Per SCEA regulations, emissions exclude light-duty automobiles and light-duty trucks (i.e., LDA, LDT1, LDT2). Detailed emissions calculations are provided in Exhibit A.

<sup>b</sup> CO<sub>2</sub>e emissions are calculated using the GWP values from the IPCC Fourth Assessment Report.

SOURCE: ESA, 2022.

### **Operation**

Area and indirect sources of GHG emissions associated with the Project would primarily result from electricity, water transport (the energy used to deliver water to and from the Project Site), and solid waste generation. As per PDF GHG-1 and PDF GHG-2, the Project would eliminate all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered. GHG emissions from electricity consumed on the Project Site would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. In addition, the new residential and retail uses at the Project Site would generate mobile source emissions from motor vehicle trips generated by residents and patrons.

The estimated operational GHG emissions resulting from the Project are shown in **Table 5-9, Operational Greenhouse Gas Emissions**. Construction emissions have been amortized as recommended by SCAQMD. The Project's amortized construction related GHG emissions are added to the operational emissions estimate in order to determine the Project's total annual GHG emissions. As shown in Table 5-9, the Project's total annual net GHG emissions would be approximately 685.9 MTCO<sub>2</sub>e per year.

**TABLE 5-9  
OPERATIONAL GREENHOUSE GAS EMISSIONS  
(METRIC TONS CO<sub>2</sub>e)**

<b>Source</b>	<b>MTCO<sub>2</sub>e</b>
<b>Existing Uses</b>	
Area	<0.1
Energy	133.2
Waste	16.6
Water	38.1
Mobile (excluding passenger vehicles and light-duty trucks)	110.7
<b>Total Existing Uses Operational GHG Emissions</b>	<b>298.6</b>
<b>Project</b>	
Area	3.6
Energy	436.7
Waste	62.2
Water	105.6
Mobile (excluding passenger vehicles and light-duty trucks)	330.9
<b>Total Project Operational GHG Emissions</b>	<b>939.0</b>
Project Construction GHG Emissions (excluding passenger vehicles and light-duty trucks)	1,366
Amortized Construction GHG Emissions (excluding passenger vehicles and light-duty trucks)	45.5
<b>Total Project Operational + Amortized Construction GHG Emissions</b>	<b>984.5</b>
<b>Net Total (Project minus Existing Uses)</b>	<b>685.9</b>
NOTES:	
<sup>a</sup> Detailed calculations are provided in Appendix G of this SCEA.	
SOURCE: ESA, 2022.	

As discussed above, the Project's compliance with regulatory programs is used to analyze the significance of its potential impacts with respect to GHG emissions dating from its post-2020 completion and operation. Under this threshold approach, the Project's GHG emissions are evaluated for consistency with each major emission sector (e.g., energy, water, waste, mobile, and stationary) addressed in the 2017 Scoping Plan to determine whether the Project's emissions would conflict with applicable sector-specific reduction targets and strategies identified in the 2017 Scoping Plan to meet the State's

2030 target under SB 32. The following sections present the sector-by-sector analysis of the Project's potential GHG impacts.

### *Area Emissions*

As shown in Table 5-9, emissions associated with the Project's area sources would be approximately 3.6 MTCO<sub>2e</sub> per year. The Project's area sources include gasoline-powered landscaping equipment (e.g., trimmers, mowers). Area source emissions associated with landscaping equipment are based on CalEEMod's default assumptions, which estimates equipment usage based on square footage of new building space. The landscaping at the Project Site would include 53 new trees, shrubs, and ground cover vegetation as opposed to grassed lawn areas, thereby minimizing the routine use of lawn mowers and grass/edge trimmers. Additionally, the Project's landscaped areas would be comprised of native and drought tolerant vegetation. This type of landscaping typically requires minimal pruning and maintenance, which also serves to minimize the use of fuel-powered landscaping equipment. The 2017 Scoping Plan does not include specific measures or 2030 emissions reduction requirements for landscaping equipment. While the inevitable transition away from fossil fuel equipment would be needed to achieve carbon neutrality by 2045, the 2017 Scoping Plan did not assume all electric landscaping equipment in their 2030 reduction analysis. Thus, because the use of trees and shrubs instead of grass lawn areas by the Project would reduce landscaping emissions relative to buildings that largely incorporate grass, the Project would be consistent with the 2017 Scoping Plan's overall goal of reducing emissions from fossil-fueled landscaping equipment.

None of the 210 residential dwelling units would be equipped with indoor fireplaces under the Project. The Project would not supply the residential units with indoor fireplaces. Thus, by not supplying indoor fireplaces for the residential units, the Project would be consistent with the 2017 Scoping Plan's goal of reducing GHG emissions associated with natural gas usage.

### *Energy Emissions*

As shown in Table 5-9 the Project's building energy emissions would be approximately 436.7 MTCO<sub>2e</sub> per year (or a net increase of 303.5 MTCO<sub>2e</sub> per year compared to the existing uses). Since the Project buildings would be electric-powered and have no natural gas infrastructure, these GHGs would be emitted indirectly from the generation of electricity by the local utility provider. The 2017 Scoping Plan outlines strategies to reduce energy demand and fossil fuel use, while increasing energy efficiency and renewable energy generation. These strategies include transitioning to cleaner fuels, greater efficiency in existing buildings, and electrification of end uses in commercial sectors.

The Office of Planning and Research's (OPR) 2018 CEQA and Climate Change Advisory recommends that a land use development project that "achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes Energy

Star appliances where available, may be able to demonstrate a less-than-significant GHG impact associated with project operation.”

The Project would install energy-efficient HVAC and lighting systems, Energy Star appliances, and meet CALGreen and Title 24 Building Standards Code requirements. The Project would also provide approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements. The Project would not include natural gas infrastructure consistent with GHG emissions reduction strategies of the 2017 Scoping Plan for 2030. Thus, the Project would be consistent with the 2017 Scoping Plan’s overall goal of reducing building energy emissions to meet the State’s 2030 GHG reduction target.

### *Mobile Source Emissions*

As shown in Table 5-9, the Project’s GHG emissions from mobile sources (excluding passenger cars and light-duty trucks) would be approximately 330.9 MTCO<sub>2e</sub> per year (or a net increase of 220.2 MTCO<sub>2e</sub> per year compared to the existing uses). GHG emissions associated with on-road mobile sources are generated from residents, workers, and visitors, and delivery vehicles traveling to and from the Project Site. As noted previously, because the Project is a transit priority project that qualifies for CEQA streamlining under SB 375, no environmental analysis is required for the Project’s GHG emissions from passenger cars and light-duty trucks. Mobile source GHG emissions are calculated based on a conservative operational year of 2026 for the Project, and future annual emissions from mobile sources associated with the Project would continue to decline as the State’s transportation sector transitions to zero-emission and lower-emission vehicles.

As discussed above, CARB acknowledges that reductions in VMT are required to meet the State’s long-term climate change goals. The Project’s urban infill location, with nearby access to public transportation in proximity to the Project Site, is consistent with State and local VMT reduction policies. The Project Site is in close proximity to multiple bus stops with high frequency transit service. The Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. As indicated on ZIMAS, the Project Site is designated as a TPA and is also within an HQTAs.

### *Land Use Emissions*

There is no existing landscaping on the Project Site. In connection with the development of the Project, 53 new trees are proposed to be planted on the Project Site, as well as other native and drought-tolerant vegetation such as shrubs and ground cover. The increase in trees and vegetation at the Project Site would increase carbon sequestration over existing conditions. While there are no relevant measures in the 2017 Scoping Plan or explicit regulatory requirements related to tree or vegetation planting, the 2017 Scoping Plan does discuss the importance of maintaining natural and working lands, which also

encompass green spaces in urban and built environments, to serve as a carbon sink. Additionally, the 2017 Scoping Plan notes that the creation and management of parks and other green space in urban areas, including expansion of the existing urban tree canopy, would help to reduce GHG emissions. Thus, the additional trees and native and drought-tolerant vegetation by the Project would be consistent with the 2017 Scoping Plan's overall goal of avoiding losses in carbon sequestration.

### *Waste Emissions*

As shown in Table 5-9, emissions associated with waste would be approximately 62.2 MTCO<sub>2e</sub> per year (or a net increase of 45.6 MTCO<sub>2e</sub> per year compared to the existing uses), not accounting for GHG reductions that would occur as a result of required waste diversion, composting, recycling, and reuse. Solid waste may be disposed in landfills or diverted for recycling, composting, or reuse. GHG emissions from landfills are generated through anaerobic breakdown of material. The 2017 Scoping Plan aims to reduce waste emissions by diverting waste away from landfills through waste reduction, re-use, composting, and material recovery. In addition, AB 341 requires mandatory recycling for certain commercial businesses, including a multi-family residential dwelling of five units or more.

As of February 1, 2018, a new waste and recycling system for all businesses and large apartment complexes in the City referred to as "recycLA" was implemented by the LA Sanitation & Environment (LASAN), which is responsible for overseeing the collection and recycling of waste generated by residential, commercial and industrial uses in the City and surrounding communities. Under the recycLA program, the City is divided into 11 different service zones and waste collection contracts are awarded to seven different companies to collect trash at businesses, apartment buildings, and condos in those areas. Part of the services that recycLA will offer to businesses and large multi-family customers include blue bins for recycling and organics recycling. The implementation of this program aims to reduce landfill disposal by one million tons per year by 2025 and reduce waste by 65 percent in all 11 of the City's service zones, with the goal of achieving zero waste by 2050. Thus, upon the Project's completion and operation anticipated in 2026, the Project would be served by this solid waste collection and recycling service, which would be consistent with the 2017 Scoping Plan's overall goal of reducing waste emissions and its specific strategy to avoid landfill CH<sub>4</sub> emissions by reducing the disposal of landfilled waste and organics through programs such as edible food recovery programs. In addition, these features would support and comply with AB 341's mandatory recycling requirement and support the state's recycling goal.

### *Water and Wastewater Emissions*

As shown in Table 5-9, the annual emissions associated with water use would be approximately 105.6 MTCO<sub>2e</sub> (or a net increase of 67.5 MTCO<sub>2e</sub> per year compared to the existing uses) during the Project's opening year in 2026. Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water

depends on the volume of water as well as the sources of water. The 2017 Scoping Plan outlines objectives and goals to reduce GHGs in the water sector, including using and reusing water more efficiently through greater water conservation, drought tolerant landscaping, stormwater capture, and water recycling. Regulations have further targeted water supply and water conservation (e.g., SB X7-7) through building and landscaping efficiency (e.g., Title 24).

The Project would incorporate water efficiency measures in compliance with the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code, which incorporates by reference the CALGreen Code. The Project's design would utilize low-flow plumbing fixtures that at a minimum comply with the flush volumes and gallons per minute water rates in the CALGreen Code and City requirements that decreases indoor water use. Outdoor water conservation measures include the installation of water-efficient irrigation systems and the planting of water-efficient landscaping consisting of native and drought-tolerant vegetation to minimize irrigation requirements. Thus, the indoor and outdoor water conservation measures of the Project serve to support ongoing regulatory programs (e.g., SB X7-7, Title 24) that aim to reduce GHG emissions associated with conveying water and distributing water to ultimately achieve climate neutrality.

### ***CARB 2017 and 2022 Climate Change Scoping Plan***

At the State level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (i.e., AB 32) and codified into law in HSC Division 25.5. Executive Order B-30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in HSC Division 25.5.

In 2016, the California Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197. SB 32 and AB 197 amended Health and Safety Code Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030, with provisions included to ensure that the benefits of state climate policies reach into vulnerable communities. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from

a climate change perspective.”<sup>126</sup> It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

The CARB 2017 Scoping Plan states that it “outlines a path to achieve the SB 32 target that requires less reliance on fossil fuels and increased investment in low carbon fuels and clean energy technologies” (CARB 2017). The CARB 2017 Scoping Plan also estimates that achieving the 2030 target is consistent with progress toward achieving the 2050 level included in EO S-3-05, and that depending on the success in achieving the 2030 target, it may be possible to achieve the 2050 target earlier than EO S-3-05 (CARB 2017).

In December 2022 CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan expands on prior Scoping Plans (including the 2017 Scoping Plan) and responds to more recent legislation by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state’s climate target of reducing anthropogenic emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier.<sup>127</sup> The 2022 Scoping Plan outlines the strategies the state will implement to achieve carbon neutrality by reducing GHGs to meet the anthropogenic target and by expanding actions to capture and store carbon through the state’s natural and working lands and using a variety of mechanical approaches. The major element of the 2022 Scoping plan is the decarbonization of every sector of the economy. This requires rapidly moving to zero-emission transportation for cars, buses, trains, and trucks; phasing out the use of fossil gas for heating; clamping down on chemicals and refrigerants; providing communities with sustainable options such as walking, biking, and public transit to reduce reliance on cars; continuing to build out solar arrays, wind turbine capacity, and other resources to provide clean, renewable energy to displace fossil-fuel fired electrical generation; scaling up new options such as renewable hydrogen for hard-to-electrify end uses and biomethane where needed. “Successfully achieving the outcomes called for in the Scoping Plan would reduce demand for liquid petroleum by 94 percent and total fossil fuel by 86 percent by 2045 relative to 2022”.<sup>128</sup> Despite these efforts, some amount of residual emissions will remain from hard-to-abate industries such as cement, internal combustion vehicles still on the road, and other sources of GHGs, including high global warming chemicals used as refrigerants. The 2022 Scoping Plan addresses the remaining emissions by re-envisioning natural and working lands to ensure they incorporate and store as much carbon as possible. Since working lands will not provide enough sequestration or carbon storage on their own to address the residual emissions, additional methods of capturing, removing, and storing carbon dioxide need to be explored, developed, and deployed.

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<sup>126</sup> California Air Pollution Control Officers Association, CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.

<sup>127</sup> California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, 2022.

<sup>128</sup> California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, 2022.

The CARB 2022 Scoping Plan expands on prior Scoping Plans and recent legislations, such as AB 1279, by outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state’s climate target of reducing anthropogenic GHG emissions to 85 percent below 1990 levels and achieving carbon neutrality by 2045 or earlier. To achieve carbon neutrality by 2045, the 2022 Scoping Plan contains GHG reductions, technology, and clean energy mandated by statutes, reduction of short-lived climate pollutants, and mechanical carbon dioxide capture and sequestration actions. The Project is designed to be consistent with the reduction measures and recommendations contained in CARB’s 2022 Scoping Plan.

**Table 5-10a**, *Project Compliance with Applicable 2017 Climate Change Scoping Plan Actions and Strategies*, and **Table 5-10b**, *Project Compliance with Applicable 2022 Climate Change Scoping Plan Actions and Strategies*, contain a list of GHG-reducing strategies as they relate to the Project. The analysis describes the consistency of the Project with these strategies that support the State’s strategies in the Climate Change Scoping Plan to reduce GHG emissions. The Climate Change Scoping Plan relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. As shown below and as provided in PDF AIR-1, PDF GHG-1, and PDF GHG-2, the Project would implement project design features and incorporate characteristics to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
<p><b>Senate Bill 350 (SB 350):</b> The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California Renewable Portfolio Standard (RPS) program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.<sup>a</sup> Required measures include:</p> <ul style="list-style-type: none"> <li>• Increase RPS to 50 percent of retail sales by 2030.</li> <li>• Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative</li> </ul>	<p>CPUC, CEC, CARB</p>	<p><b>No Conflict.</b> While this action applies to California Public Utilities Commission (CPUC), CEC, and CARB, the Project would use electricity provided by LADWP, which is required to meet the energy performance standard of 50 percent renewable energy by 2030, along with applicable GHG emissions reductions planning targets in its Strategic Long-Term Resource Plan. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. In 2020, LADWP provided 36.7 percent from renewable sources, exceeding the required target 33 percent by 2020 established under previous legislation.<sup>b</sup></p>



**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
<p>doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.</p> <ul style="list-style-type: none"> <li>Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.</li> </ul>		<p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would meet or exceed the applicable requirements of Title 24, Part 6, as well as the CALGreen Code in Title 24, Part 11 as adopted and amended in the City of Los Angeles Green Building Code.</p>
<p><b>Implement Mobile Source Strategy (Cleaner Technology and Fuels):</b></p> <ul style="list-style-type: none"> <li>At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025.</li> <li>At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.</li> <li>Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations.</li> <li>Implementation of federal phase 2 standards for medium- and heavy-duty vehicles.</li> <li>Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO<sub>x</sub> standard.</li> <li>Last Mile Delivery: New regulation that would result in the use of low NO<sub>x</sub> or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5</li> </ul>	<p>CARB, CalSTA, SGC, Caltrans, CEC, OPR, Local Agencies</p>	<p><b>No Conflict.</b> CARB approved the Advanced Clean Cars Program that includes 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 EVs), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. While this action does not directly apply to individual projects, the standards would apply to all vehicles purchased or used by residents and visitors to the Project. The Project would comply with CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces to support ZEVs and PHEVs. As such, the Project would support compliance with this regulation.</p> <p>The Advanced Clean Truck Regulation has two components, a manufacturer sales requirement and a reporting requirement. The manufacturer component of the regulation requires manufacturers that certify Class 2b-8 chassis or complete vehicles with combustion engines would be required to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales would need to be 55 percent of Class 2b – 3 truck sales, 75</p>

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
<p>percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.</p> <ul style="list-style-type: none"> <li>Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”</li> </ul>		<p>percent of Class 4 – 8 straight truck sales, and 40 percent of truck tractor sales. The reporting component of the regulation requires large employers including retailers, manufacturers, brokers and others would be required to report information about shipments and shuttle services. Fleet owners, with 50 or more trucks, would be required to report about their existing fleet operations.<sup>c</sup> This would be applicable to occasional delivery trucks to the Project Site, which would be subject to this regulation, therefore the Project would benefit from these measures.</p> <p>CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.<sup>d</sup> GHG emissions generated by transit trips by Project users, would be reduced under this regulation.</p> <p>GHG emissions generated by Project-related passenger, truck, and bus vehicular travel would benefit from the above regulations and programs, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program, Advanced Clean Truck Regulation, and Innovative Clean Transit measure consistent with reduction of GHG emissions under SB 32. SB 375 requires SCAG to direct the development of the RTP/SCS for the region, which is discussed in this SCEA. The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for residents, employees, vendors and visitors. The Project would support reducing VMT given its location at an urban infill location with nearby access to public transportation within 0.5 miles of the Project Site. As</p>

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
		<p>discussed in Chapter 2, <i>Project Description</i>, and Chapter 3, <i>SCEA Criteria and TPP Consistency Analysis</i>, the Project Site is located within a designated TPA and within an HQTA. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site.</p> <p>To further reduce reliance on fossil fuels and transportation-related GHG emissions, the Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 California Green Building Standards (CALGreen) Code.</p> <p>The Project would also provide 142 bicycle parking spaces.</p>
<p><b>Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets).</b></p>	CARB	<p><b>No Conflict.</b> Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years, which have been updated in 2018. As part of the 2018 updates, the CARB adopted a passenger vehicle related GHG reduction of 19 percent per capita for 2035 for the SCAG region. The Project would be consistent with SB 375 as it would be an infill development with various transit options. The Project would also provide 142 bicycle parking spaces.</p> <p>The Project's location and design would facilitate a reduction in VMT and related vehicular GHG emissions. As such, the Project would not conflict with the 2017 Climate Change Scoping Plan's action to increase stringency of SB 375 Sustainable Communities Strategy (2035 Targets).</p>
<p><b>By 2019, adjust performance measures used to select and design transportation facilities.</b></p>	California State Transportation Agency	<p><b>Not Applicable.</b> The Project would not involve construction of transportation facilities. However, the Project would provide</p>

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
<ul style="list-style-type: none"> <li>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).</li> </ul>	(CalSTA) and Strategic Growth Council (SGC), OPR, CARB, California Governor's Office of Business and Economic Development (GoBiz), California Infrastructure and Economic Development Bank, California Department of Finance (DOF), County Transportation Commission (CTC), California Department of Transportation (Caltrans)	residents and visitors with the ability to access nearby public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions. As such, the Project would not conflict with the 2017 Climate Change Scoping Plan's action to adjust performance measures used to select and design transportation facilities.
<b>By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).</b>	CalSTA, Caltrans, CTC, OPR/SGC, CARB	<b>No Conflict.</b> While this action applies to CalSTA, Caltrans, CTC, OPR/SGC, and CARB, the Project would support this policy through compliance with CalGreen requirements regarding the number of EV Ready and EV Capable parking spaces. As such, the Project would support compliance with this regulation.
<b>Implement California Sustainable Freight Action Plan:</b> <ul style="list-style-type: none"> <li>Improve freight system efficiency.</li> <li>Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</li> </ul>	CalSTA, California Environmental Protection Agency (CalEPA), CNRA, CARB, CalTrans, CEC, GoBiz	<b>Not Applicable.</b> The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
<b>Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.</b>	CARB	<b>No Conflict.</b> While this regulatory program applies to fuel suppliers and not directly to land use development, GHG emissions

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
		<p>related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with Low Carbon Fuel Standard (LCFS).</p> <p>On September 27, 2018, CARB approved an amendment to the LCFS regulation to require a 20 percent reduction in carbon intensity from a 2010 baseline by 2030. Reductions in carbon intensity are phased in starting in 2019 with a reduction of 6.25 percent and increases by 1.25 percent each year. Thus, in 2021, LCFS emissions reductions are 8.75 percent reduced carbon intensity relative to the 2010 baseline. Project-related mobile source GHG emissions would be reduced accordingly, and would increase as LCFS compliance increases to 20 percent reduce carbon intensity by 2030 relative to the 2010 baseline year.</p>
<p><b>Implement the Short-Lived Climate Pollutant Strategy by 2030:</b></p> <ul style="list-style-type: none"> <li>• 40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels.</li> <li>• 50-percent reduction in black carbon emissions below 2013 levels.</li> </ul>	<p>CARB, California Department of Resources Recycling and Recovery (CalRecycle), CDFR, SWRCB, Local air districts</p>	<p><b>No Conflict.</b> SB 605, adopted in 2014, directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. SB 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for CH<sub>4</sub> and HFCs and 50 percent black carbon emissions below 2013 levels.<sup>e</sup></p> <p>SB 1383 requires various agencies including CARB, California Department of Food and Agriculture (CDFR), the State Water Resources Board (SWRCB) to be responsible for adopting regulations to reduce GHG emissions. These regulations would be applicable to the Project. Therefore, the Project would comply with the CARB SLCP Reduction Strategy, which limits the use of HFCs for refrigeration uses.</p>
<p><b>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</b></p>	<p>CARB, CalRecycle, CDFR, SWRCB, Local air districts</p>	<p><b>No Conflict.</b> While this action applies to the California Department of Resources Recycling and Recovery CalRecycle, under SB 1383, CalRecycle is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. The Project would be</p>

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
		consistent with AB 341 which requires not less than 75 percent of solid waste generated to be source reduced through recycling, composting, or diversion. This reduction in solid waste generated by the Project would reduce overall GHG emissions. Compliance with AB 341 would also help achieve the goals of SB 1383.
<b>Implement the post-2020 Cap-and-Trade Program with declining annual caps.</b>	CARB	<b>No Conflict.</b> While this action applies to CARB, AB 398 was enacted in 2017 to extend and clarify the role of the State's 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. Under the Cap-and-Trade program, entities such as power generation companies and natural gas processing plants would be required to limit or reduce GHG emissions. While the Project itself is not a regulated entity under the Cap-and-Trade Program, it would result in a reduction of GHG emissions associated with the Project's energy usage, since energy supplied to the Project would be from a regulated entity. As the Project would not impede the Program's progress, the Project is considered compliant.
<b>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</b> <ul style="list-style-type: none"> <li>• Protect land from conversion through conservation easements and other incentives.</li> <li>• Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity.</li> <li>• Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments.</li> <li>• Establish scenario projections to serve as the foundation for the Implementation Plan.</li> </ul>	California Natural Resources Agency (CNRA) and departments within, CDFA, CalEPA, CARB	<b>Not Applicable.</b> This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

**TABLE 5-10a**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2017 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Responsible Party(ies)	Conflict Analysis
<b>Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.</b>	CARB	<b>Not Applicable.</b> This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
<b>Implement Forest Carbon Plan.</b>	CNRA, California Department of Forestry and Fire Protection (CAL FIRE), CalEPA and departments within	<b>Not Applicable.</b> This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
<b>Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.</b>	State Agencies & Local Agencies	<b>Not Applicable.</b> Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.

<sup>a</sup> Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.

<sup>b</sup> California Energy Commission, Utility Annual Power Content Labels for 2020, Los Angeles Department of Water and Power, <https://www.energy.ca.gov/filebrowser/download/3872>, accessed October 28, 2022

<sup>c</sup> CARB, Advance Clean Cars, 2017 Midterm Review, <https://ww2.arb.ca.gov/resources/documents/2017-midterm-review-report>, accessed October 28, 2022.

<sup>d</sup> CARB, Advanced Clean Local Trucks, 2022, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>, accessed October 28, 2022.

<sup>e</sup> CalRecycle, 2022, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, <https://www.calrecycle.ca.gov/climate/slcp/>, accessed October 28, 2022.

SOURCE: ESA, 2022.

**TABLE 5-10B**  
**PROJECT COMPLIANCE WITH APPLICABLE**  
**2022 CLIMATE CHANGE SCOPING PLAN ACTIONS AND STRATEGIES**

Actions and Strategies	Conflict Analysis
<b>Increase in Renewable Energy and Decrease in Oil and Gas Use Actions</b>	<b>No Conflict.</b> This goal applies to increasing renewable energy and a decrease in oil and gas actions. The Project is all electric and eliminates the use of gas stoves and appliances.

<b>Low Carbon Fuels Actions</b>	<b>No Conflict.</b> The Project would generate vehicle trips that would travel to and from the Project's residential uses, similar to housing developments in the City. Vehicles accessing the Project, including construction vehicles and trucks, and residential vehicles and delivery service trucks would utilize fuels that comply with the State of California low carbon fuel standard. The Project would not conflict with the State's ability to implement the low carbon fuel standard.
<b>Expansion of Electrical Infrastructure Actions</b>	<b>Not Applicable.</b> The Project is a residential building. As discussed in Section XIX, <i>Utilities and Service Systems</i> , the Project would be within the supply and infrastructure service capabilities of LADWP. LADWP has provided a will serve letter indicating that electrical power services are available and can serve the Project. Thus, the Project does not require the expansion of electrical infrastructure. This action does not apply to the Project.
<b>Climate Ready and Climate-Friendly Buildings</b>	<b>No Conflict.</b> The goal of this action is to expand the number of all-electric and electric-ready homes by 2030. This will strengthen building standards to support zero-emission new construction and developing building performance standards for existing buildings and by adopting a zero-emission standard for new space and water heaters beginning in 2030. The Project is an all-electric building in proximity to a transit corridor and accessible public transit. As such, the Project would support this action and would not conflict with the State's ability to reduce Statewide GHG emissions through all-electric and electric-ready homes.
<b>Expanded Use of Zero-Emission Mobile Source Technology Actions</b>	<b>No Conflict.</b> Decarbonizing the transportation sector, including transitioning to 100 percent sales of zero emission (ZE) light-duty vehicles by 2035 and medium- and heavy-duty vehicles by 2040; achieving a 20 percent zero emission target for the aviation sector, and developing a rapid and robust network of ZEV refueling infrastructure. The Project would support this action by providing 115 EV stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code. As such, the Project would support this action and would not conflict with the State's ability to reduce Statewide GHG emissions through ZE vehicles.
<b>Mechanical Carbon Dioxide Removal and Carbon Capture and Sequestration Actions</b>	<b>No Conflict.</b> No trees are currently located on the Project Site. The landscaping at the Project Site would include 53 new trees, shrubs, and ground cover vegetation. The Project will introduce a variety of native species to the outdoor landscaping areas. As such, the Project would increase carbon sequestration as well as provide green space. The Project would support this action and would not conflict with the State's ability to reduce Statewide GHG emissions through carbon removal and sequestration actions.
<b>Improvements to Oil and Gas Facilities Actions</b>	<b>Not Applicable.</b> The Project is a 210 dwelling unit residential building. As such, this action does not apply to the Project.
<b>Reduced High-GWP Fluorinated Gases Actions</b>	<b>No Conflict.</b> Expanding use of low-GWP refrigerants within buildings; increasing funding to decarbonize existing buildings and appliance replacements; and implementing biomethane procurement targets for investor-owned utilities. The Project would utilize refrigerants within the proposed buildings (e.g., air conditioning systems) in compliance with



	applicable State and local regulations and as such, the Project would not conflict with the State's ability to achieve GHG reductions under this action.
<b>Forest, Shrubland, and Grassland Management Actions</b>	<b>No Conflict.</b> Increasing urban forestry investment annually by 200 percent relative to business as usual. No trees are currently located on the Project Site. The landscaping at the Project Site would include 53 new trees, shrubs, and ground cover vegetation. The Project will introduce a variety of native species to the outdoor landscaping areas. As such, the Project would increase the vegetation on the Project Site. The Project would support this action and would not conflict with the State's ability to reduce Statewide GHG emissions through urban forestry actions.
<b>Agricultural Actions</b>	<b>Not Applicable.</b> Increasing climate smart forest, shrubland, and grassland management to at least 2.3 million acres a year—an approximately 10x increase from current levels. The Project is in an urban center and would have no agricultural uses. As such, this action does not apply to the Project.
<b>Organic Waste Diversion and Composting Actions</b>	<b>No Conflict.</b> The City of Los Angeles introduced a Mandatory Organic Waste Disposal Reduction Ordinance in November 2021, which was adopted to reduce the amount of compostable waste disposed into landfills. The Project must comply with the City's ordinance and would utilize a municipal solid waste collection service that is licensed to operate in the City and required to divert organic waste from landfills as required in the City's ordinance. As such, the Project would not conflict with this goal.
<b>Afforestation, Urban Forestry Expansion, Urban Greening, Avoided Natural and Working Land Use Conversion, and Wetland Restoration Actions</b>	<b>No Conflict.</b> No trees are currently located on the Project Site. The landscaping at the Project Site would include 53 new trees, shrubs, and ground cover vegetation. The Project will introduce a variety of native species to the outdoor landscaping areas. As such, the Project would increase the vegetation on the Project Site. The Project would support this action and would not conflict with the State's ability to reduce Statewide GHG emissions through urban forestry actions.
<b>Reduced VMT Actions</b>	<b>No Conflict.</b> The Project would support reducing VMT given its location at an urban infill location with nearby access to public transportation within 0.5 miles of the Project Site. As discussed in Chapter 2, Project Description, and Chapter 3, SCEA Criteria and TPP Consistency Analysis, the Project Site is located within a designated TPA and within an HQT. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. As such, the Project would support reduced VMT actions and would not conflict with the State's ability to reduce Statewide GHG emissions through reducing VMT.

SOURCE: ESA, 2022.

### **SCAG Connect SoCal 2020**

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including Connect SoCal 2020, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, Connect SoCal 2020 is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of Connect SoCal 2020 is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. To accomplish this goal, Connect SoCal 2020 identifies various strategies to reduce per capita VMT. Connect SoCal 2020 is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

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

In order to assess the Project's potential to conflict with Connect SoCal 2020, this section analyzes the Project's land use characteristics for consistency with the strategies and policies set forth in Connect SoCal 2020 to meet GHG emission-reduction targets set by CARB.<sup>129</sup> Generally, projects are considered to not conflict with applicable land use plans and regulations, such as Connect SoCal 2020, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As shown in **Table 5-11, Comparison of Project Characteristics with Applicable SCAG Connect SoCal 2020 Actions and Strategies**, below, the Project would not conflict with Connect SoCal 2020 goals and benefits intended to improve mobility and access to diverse destinations, provide better "placemaking," provide more transportation choices, and reduce vehicular demand and associated emissions. Thus, successful implementation of Connect SoCal 2020 would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. As discussed in the above analysis and in Table 5-11, the Project would be consistent with and support the goals and benefits of Connect SoCal 2020 that are potentially applicable to the Project. As a result, the Project would be consistent with, and would not conflict with, applicable Connect SoCal 2020 actions and strategies to reduce GHG emissions.

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<sup>129</sup> As discussed in Connect SoCal 2020, the actions and strategies included in Connect SoCal 2020 remain unchanged from those adopted in the 2012–2035 and 2016–2040 RTP/SCS.

**TABLE 5-11**  
**CONSISTENCY WITH APPLICABLE CONNECT SOCAL 2020 ACTIONS AND STRATEGIES**

Actions and Strategies	Consistency Analysis
<b>Land Use Actions and Strategies</b>	
<p>Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.</p>	<p><b>No Conflict.</b> This action applies to local jurisdictions, COGs, SCAG and CTCs. While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by designating a minimum of 142 bike parking spaces. The Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code.</p>
<p>Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.</p>	<p><b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, the Project would be near multiple transportation routes, place housing near jobs and transit, and provide ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. Walkways would be provided around the building perimeter to provide safe pedestrian access through the Project Site to the building entrances. Guests, residents, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking facilities. The Project would further encourage pedestrian travel by incorporating new residential uses and locating them on a site that would be within walking distance to businesses in the area and near multiple transit options.</p>
<p>Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.</p>	<p><b>No Conflict.</b> While this action applies to local jurisdictions, the Project would support the development of complete communities by co-locating complementary residential land uses in close proximity to existing off-site office, institutional, recreational, and neighborhood-serving commercial uses, and being located in a highly walkable area well-served by transit within 0.5-miles of the Project Site.</p>
<p>Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full range of shopping, entertainment and services all within a relatively short distance.</p>	<p><b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, the Project would support the development of complete communities by co-locating complementary residential land uses in close proximity to existing off-site office, institutional, recreational, and neighborhood-serving commercial uses, and being located in a highly walkable area well-served by transit within 0.5-miles of the Project Site..</p>
<p>Pursue joint development opportunities to encourage the</p>	<p><b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, the Project is located within 0.5-miles of a bus</p>

Actions and Strategies	Consistency Analysis
development of housing and-mixed use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	lines; the regional freeway system; bicycle lanes; and an established pedestrian grid. As discussed in Chapter 2, <i>Project Description</i> , and Chapter 3, <i>SCEA Criteria and TPP Consistency Analysis</i> , the Project Site is located within a designated TPA and within an HQTAs. Several transit stops for Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7 are located within 0.5 mile of the Project Site. Additionally, the Project would co-locate residential land uses in close proximity to existing off-site office, institutional, recreational, and neighborhood-serving commercial uses.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	<b>No Conflict.</b> While this action applies to the State and SCAG, the Project would be consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs through infill development. The Project is a residential development in close proximity to existing off-site office, institutional, recreational, and neighborhood-serving commercial uses. The Project is also located in a walkable area served by frequent and comprehensive transit within 0.5-miles of the Project Site. The increases in land use intensity on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.
Transportation Network Actions and Strategies	
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	<b>No Conflict.</b> While this action applies to local jurisdictions, SCAG and CTCs, the Project would intensify development in an area directly served by the bus lines that travel on Glencoe Avenue, Washington Boulevard, and Lincoln Boulevard. Furthermore, the Project would provide residential uses in an area with pedestrian access to a large range of commercial uses.
Transportation Demand Management Actions and Strategies	
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, as part of the TDM Program, the Project would provide bicycle parking per LAMC requirements (see Section XVII, Transportation, for more information).
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	<b>No Conflict.</b> While this action applies to local jurisdictions and CTCs, the Project's residential land use would provide residents with appropriate connectivity within the conference and business amenities (e.g., internet connectivity ports and/or wireless internet) to provide residents with the option to telecommute from their residence. Thus, the Project would not impact or conflict with the City's ability to encourage telecommuting.
Clean Vehicle Technology Actions and Strategies	
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet	<b>No Conflict.</b> While this action applies to local jurisdictions and SCAG, as discussed above, and while directing the use of alternative-fueled vehicles is beyond the direct control or

Actions and Strategies	Consistency Analysis
conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	influence of the Project, the design would provide for the installation of 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code.
SOURCE: ESA, 2022.	

### **City of Los Angeles – Sustainable City pLAN**

The City’s 2015 Sustainable City pLAN (2015 pLAN) was recently updated with the 2019 Los Angeles Green New Deal, which expands in more detail the vision to achieve a sustainable future with a carbon-neutral economy by 2050. The Green New Deal establishes goals and actions to reduce the emissions of GHGs from both public and private activities, specifically it accelerates the targets from the 2015 pLAN for supplying renewable energy, increasing local water sourcing, reducing building energy, reducing VMT per capita, reducing municipal GHG emissions, increasing the percentage of zero emission passenger and City-fleet vehicles, building new housing near transit, and increasing the number of green jobs. Of the issue areas that are addressed in separate chapters in the 2019 updates to the 2015 pLAN, those that are relevant for the Project include: Renewable Energy, Local Water, Clean & Health Buildings, Housing & Development, Mobility & Public Transit, Zero Emission Vehicles, Water & Resource Recovery, and Urban Ecosystems & Resilience

**Table 5-12**, *Consistency with City of Los Angeles Sustainable City pLAN*, contains a list of GHG-reducing strategies applicable to the Project. The Project-level analysis describes the consistency of the Project with these GHG emissions reduction goals and actions. As demonstrated in Table 5-12 below, the Project is consistent with the applicable goals and actions. In addition, as discussed, the Project would also result in GHG reductions beyond those specified by the City and would minimize the GHG emissions relative to the existing Project Site conditions by incorporating energy efficient design features and VMT reduction characteristics.

**TABLE 5-12**  
**CONSISTENCY WITH CITY OF LOS ANGELES SUSTAINABLE CITY pLAN**

Target	Project Consistency
<b>Chapter 3: Local Water</b>	
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.	<b>No Conflict.</b> While this action primarily applies to the City and LADWP and not to individual projects, the Project would comply with the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code and incorporate water efficiency measures. The Project’s design would utilize low- flow plumbing fixtures that at a minimum comply with the flush volumes and gallons per minute water

Target	Project Consistency
	rates in the CALGreen Code and City requirements to reduce indoor water use. The Project also incorporates outdoor water conservation measures including the installation of water-efficient irrigation systems and the planting of water-efficient landscaping consisting of native and drought-tolerant vegetation to minimize irrigation requirements.
<b>Chapter 4: Clean and Healthy Buildings</b>	
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 thousand British Thermal Units per square foot in 2015).	<b>No Conflict.</b> While this action applies to City departments and not to private development, the Project would install energy efficient HVAC and lighting systems, Energy Star appliances, and meet CALGreen and Title 24 Building Standards Code requirements. The Project would also provide approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements. As per PDF GHG-1 and PDF GHG-2, the Project would virtually eliminate nearly all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered.
All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.	<b>No Conflict.</b> The Project would comply with the State's and City's requirements that are designed to reduce GHG emissions over time, including the LA Green Building Code, Title 24, and other increasingly stringent energy conservation programs. In addition, the Project would help the City move toward a net zero carbon future. The Project would also provide approximately 5,807 square feet of solar ready areas on the roof, in compliance with solar ready requirements. As per PDF GHG-1 and PDF GHG-2, the Project would virtually eliminate nearly all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered.
<b>Chapter 5: Housing and Development</b>	
Ensure 57 percent of new housing units are built within 1,500 ft. of transit by 2025; and 75 percent by 2035. Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.	<b>No Conflict.</b> The Project is located in an urban infill location that is in proximity of public transportation, including multiple bus stops that run along Washington Boulevard, Lincoln Boulevard, and Glencoe Avenue. Of the 210 dwelling units, 18 units would be very low-income units.
<b>Chapter 6: Mobility &amp; Public Transit</b>	
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.	<b>No Conflict.</b> The Project would reduce VMT by encouraging the use of transit, walking, and bicycling by locating its residential development on a Project Site that is located near off-site office, institutional, recreational, and neighborhood-serving commercial uses. The Project is also located in a walkable area served by frequent and comprehensive transit within 0.5-miles of the Project Site. The diversity of land uses in proximity to the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation.

Target	Project Consistency
Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.	<b>No Conflict.</b> The Project would reduce VMT by encouraging the use of transit, walking, and bicycling by locating its residential development on a Project Site that is located near off-site office, institutional, recreational, and neighborhood-serving commercial uses. The Project is also located in a walkable area served by frequent and comprehensive transit within 0.5-miles of the Project Site. The diversity of land uses in proximity to the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation.
<b>Chapter 7: Zero Emission Vehicles</b>	
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.	<b>No Conflict.</b> While this action applies to the City and not to individual projects, the Project would encourage the use of alternative-fueled vehicles by designating a minimum of 142 bike parking spaces. The Project would provide 115 electric vehicle (EV) stalls, including 15 stalls that are equipped with charging stations, 29 EV capable stalls, and 71 EV ready stalls for future stations, which would meet the 15 stalls equipped with EV chargers, 29 EV capable stalls, and 71 EV ready stalls required under the 2022 CALGreen Code.
<b>Chapter 9: Waste &amp; Resource Recovery</b>	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	<b>No Conflict.</b> While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service under the recycLA program, which will offer blue bins for recycling and organics recycling to businesses and large multi-family customers. The implementation of this program is aimed to achieve the City's zero waste goal 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).	<b>No Conflict.</b> While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service under the recycLA program which would participate in City trash services, including separating trash from recycling through the use of blue and green recycling bins provided by LASAN.
Increase proportion of waste products and recyclables productively reused and/or repurposed within L.A. County to at least 25% by 2025; and 50% by 2035	<b>No Conflict.</b> While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service under the recycLA program, which will offer blue bins for recycling and organics recycling to businesses and large multi-family customers. The implementation of this program is aimed to achieve the City's zero waste goal by 2050.
Eliminate organic waste going to landfill by 2028.	<b>No Conflict.</b> The Project would be served by a solid waste collection and recycling service under the recycLA program, which will offer blue bins for recycling and organics recycling to businesses and large multi-family customers. The implementation of this program is aimed to achieve the City's zero waste goal by 2050.

Target	Project Consistency
<b>Chapter 11: Urban Ecosystems &amp; Resilience</b>	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.	<b>No Conflict.</b> While this action applies to the City in general, and not specifically to individual private development, the Project would add 53 trees on the Project Site.
Increase tree canopy in areas of greatest need by at least 50 percent by 2028	<b>No Conflict.</b> The existing Project Site currently has no trees. As part of the Project, 53 new trees would be added. As such, the Project would support the City's reduction target associated with increase the City's tree canopy.
SOURCE: City of Los Angeles, 2019, L.A.'s Green New Deal (Sustainable City pLAn 2019); ESA, 2022.	

### **City of Los Angeles Green Building Code**

The Project would comply with the Los Angeles Green Building Code to reduce GHG emissions by reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with Title 24 Building Energy Efficiency Standards, as amended by the City. The Project would also meet the mandatory measures of the CALGreen Code, as amended by the City, by incorporating strategies such as low-flow plumbing fixtures and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the City's Green Building Code.

### **Conclusion**

In summary, the Project's GHG emissions analysis and the Project's consistency analysis with respect to applicable regulatory plans and policies to reduce GHG emissions provided above demonstrates that the Project would incorporate sustainability measures and be located and designed in a manner consistent with the goals and GHG reduction actions and strategies outlined in CARB's Climate Change Scoping Plan, SB 375, Connect SoCal 2020, and the Sustainable City pLAn and Green Building Code. The location of the Project in an urban infill site in proximity to multiple transit options along with its mixed-use development of residential and commercial uses would also result in a reduction in VMT that is consistent with the transportation climate change goals. The Project would also result in a net increase in trees at the Project Site along with other native and drought-tolerant vegetation over existing conditions, and therefore would be consistent with the State's overall goal of avoiding losses in carbon sequestration. Given the Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of PDF GHG-1 and PDF GHG-2, the Project's GHG emissions, either directly or indirectly, would be less than significant and no mitigation measures would be required.

### **Cumulative Impacts**

As explained earlier, the analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any



single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. 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 its effect on global climate change would not be cumulatively considerable. For these reasons, the Project’s cumulative contribution to global climate change would be less than significant.

## IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The analysis is based on the information provided in the *Phase I Environmental Site Assessment Report* (Phase I ESA) prepared by Partner Engineering and Science, Inc. in April 2022, and contained in Appendix H-1, as well as the *Limited Phase II Environmental Site Assessment Results* (Phase II ESA) prepared by Geosyntec in February 2023, and contained in Appendix H-2 of this SCEA.

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

**Less than Significant with Mitigation Incorporated.** Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

**Construction**

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, and transmission fluid), and/or handling/transport of demolition debris and import/export of soils. However, these activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All Project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials/waste, ensuring that all potentially hazardous materials are used and handled in an appropriate manner.

A Phase I ESA was prepared for the Project to assess the potential for Project implementation to result in impacts related to hazards and hazardous materials. Based on the recommendations contained in the Phase I ESA, a Phase II ESA and soil, soil vapor, groundwater, and indoor and ambient air sampling were conducted to further evaluate the contaminants at the Project Site.

The Phase I ESA identified a recognized environmental condition (REC) and a business environmental risk (BER) in connection with the Project Site. A REC refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. A BER refers to a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of commercial real estate.

The Phase I ESA identified that the Project Site was previously occupied by Western Circuits, Inc. which conducted circuit board etching, plating, and fabrication activities and produced hazardous waste from 1972 to 1991 as well as on-site treating plating and rinse water waste. The Project Site, as well as parcels in close proximity to the Project Site, known as the Lincoln Assemblage, has been the subject of several studies that have indicated the use of solvents, the presence of “clarify pits” (or clarifiers) at the buildings located at 4132 and 4136 Del Rey Avenue, and the presence of undocumented fill material to 7 feet bgs at the Project Site. Results of the environmental sampling conducted as part of the previous studies indicate the presence of VOCs, including tetrachloroethylene (PCE) and trichloroethylene (TCE), in soil vapor and groundwater beneath the Project Site at concentrations exceeding applicable screening levels, as well as the presence of VOCs in shallow soil; however, not at concentrations exceeding screening levels. Additionally, results of the previous studies indicate the presence of several metals in soil beneath the Project Site, including arsenic, hexavalent chromium, and copper. Based on the identified subsurface contamination, the Phase I ESA determined that the historical use of the Project Site represents a REC. Therefore, a Phase II ESA was recommended to conduct additional investigation to further assess the extent of the impacts and human health concerns at the Project Site.

As a part of the Phase II ESA, additional soil, groundwater, and soil vapor samples were collected to augment the existing data collected in previous studies. Single (i.e., localized) detections of lead and antimony in shallow soil samples exceeded residential screening levels, but did not appear indicative of Site-wide environmental conditions. Considering the detections of antimony and lead in shallow soil samples near the 4112 and 4136 Del Rey Avenue buildings, the lack of soil data within the building footprints represents a data gap, particularly at 4136 Del Rey Avenue, where the historical “clarify pits” were identified. No VOCs were detected in soil samples at concentrations exceeding regulatory screening levels, consistent with previous findings. Groundwater samples taken from beneath the Project Site were found to contain PCE, TCE, and associated breakdown products *cis*-1,2-DCE and vinyl chloride, with TCE and *cis*-1,2-DCE at concentrations exceeding California drinking water maximum contaminant levels (MCLs) of 5 and 6 micrograms per liter. VOCs, specifically PCE and TCE, were detected at elevated concentrations in each soil vapor sample beneath the Project Site and exceeded USEPA and Department of Toxic Substances Control residential screening levels. Several VOCs were detected at concentrations exceeding applicable screening levels for indoor air in commercial/industrial properties. To reduce the potential exposure impacts to identified

contaminants, the Applicant would be required to implement the recommendations provided in the Phase II ESA, including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a Soils and Materials Management Plan (SMMP) during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1. The Oversight Agency for the Project is anticipated to be the Los Angeles County Fire Department Site Mitigation Unit's (SMU) voluntary oversight program. With implementation of MM HAZ-1, impacts related to the routine transport, use, or disposal of hazardous materials during Project construction would be less than significant.

Due to the age of the buildings on site, there is the potential for asbestos containing materials (ACM) and lead based paint (LBP) to be present in the existing structures, which the Phase I ESA identified as a BER. During a site survey, it was determined that the existing structures are in good condition; however, both ACMs and LBPs could be present and would need to be further evaluated prior to any renovation or demolition activities at the Project Site to prevent potential exposure to workers and/or building occupants. ACMs and LBPs are highly regulated and testing of any suspected buildings or portions thereof for ACMs and LBPs is part of standard construction practice at the time of renovation or demolition. In the event that ACMs and/or LBPs are discovered, their removal would be subject to specific and detailed SCAQMD and Division of Occupational Safety and Health requirements to ensure the proper training, containment, handling, notification, and disposal of these materials by licensed asbestos and LBP abatement contractors. Compliance with regulatory requirements would ensure that impacts associated with ACMs and LBPs would be less than significant.

### ***Operation***

Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to other urban residential developments, and may include cleaning solvents, paints, and pesticides for landscaping. These potentially hazardous materials would be used and stored in accordance with regulatory requirements and manufacturers' instructions. As described above, the results of the Phase II Investigation identified existing vapor intrusion risk that would present a human health risk hazard during operation of the Project. With implementation of MM-HAZ-1, a vapor barrier would be installed beneath the new proposed construction, thereby addressing this existing human health risk. Therefore, MM HAZ-1, would reduce existing human health risk impacts on site to a less than significant level, as well as ensure adherence to all regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances. Therefore, operational impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

### **Mitigation Measure**

**MM HAZ-1:** To further reduce potential impacts, the Project shall implement the following measures, as described below:

- The Applicant shall obtain Oversight Agency approval of additional soil investigation consisting of the collection of soil samples within the footprints of the buildings at 4112, 4132, and 4136 Del Rey. The soil samples from these locations shall be analyzed for metals, and samples collected near the historical clarifier at 4136 Del Rey shall include analysis of VOCs.
- The Applicant shall obtain Oversight Agency approval of a Soils and Materials Management Plan (SMMP) to be implemented during all ground-disturbing activities. The SMMP shall include information related to the Project Site history, previous investigation results (including the additional soil investigations at 4112, 4132, and 4136 Del Rey Avenue), and impacts to soil, and outline protocols for identifying, handling, and disposing of impacted soil in conformance with all applicable regulatory requirements.
- Any additional groundwater investigations, if required, shall be developed in coordination with the Oversight Agency and completed in general accordance with State of California environmental regulations.
- The Applicant shall obtain Oversight Agency approval of and install a vapor barrier beneath the new proposed construction.
- Any additional evaluations of indoor air, if required, shall be developed in coordination with the Oversight Agency and completed in general accordance with State of California environmental regulations.

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

**Less than Significant with Mitigation Incorporated.** As part of the Phase I ESA prepared for the Project Site, regulatory databases were reviewed for the Project Site and properties within the standard search radii pursuant to California Government Code Section 65962.5. The databases searched are known as the “Cortese List” and include EnviroStor, GeoTracker, and other lists compiled by CalEPA. The Project Site is identified in several listings within the regulatory database report, as described in additional detail under response to Checklist Question IX.d, below. Identification within these databases, which include listings of properties that have documented conditions related to hazardous materials, conditions, or contamination, may indicate a REC for the Project and, therefore, a potentially significant impact. To mitigate any potential impacts, as discussed under response to Checklist Question IX.a, the Applicant would implement the recommendations provided in the Phase II ESA, including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a SMMP during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1.

In addition, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This would ensure that potential risks associated with construction-related activities are minimized.

Moreover, as described above, any identified ACM or LBP would be abated/removed in conformance with all applicable regulatory requirements, thereby eliminating any risk of creating a significant hazard. Therefore, with application of the recommendations provided in the Phase II ESA and implementation of MM HAZ-1, impacts related to the creation of 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 would be less than significant.

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

**Less than Significant Impact.** The closest school to the Project Site is Morning Glory Preschool, located approximately 0.27 mile to the northwest at 2552 Lincoln Boulevard. The Project would use minor amounts of paints, cleaning supplies, and small amounts of petroleum products consistent with other multi-family residential properties, and in accordance with all applicable federal, state, and local regulations. As such, the Project will not emit hazardous emissions or handle hazardous materials within one-quarter mile of a school. Furthermore, as discussed in subsections A and B above, implementation of MM-HAZ-1 would reduce any potential impacts to a less than significant level, as well as ensure adherence to all regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances. Impacts would be less than significant, and no mitigation measures would be required.

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

**Less than Significant with Mitigation Incorporated.** As discussed under the response to Checklist Question IX.b, as part of the Phase I ESA prepared for the Project Site, regulatory databases were reviewed for the Project Site and properties within the standard search radii as required by California Government Code Section 65962.5. The databases are known as the "Cortese List" and include EnviroStor, GeoTracker, and other lists compiled by the CalEPA. The Project Site is identified as a Los Angeles County - CUPA Program Records, Hazardous Waste Manifest Data, Toxic Pollutant Emissions Facilities, Facility Registry Service/Facility Index, Historical Hazardous Waste Manifest Data, Los Angeles County – City of Los Angeles Hazardous Materials Facilities, Comprehensive Environmental Response, Compensation and Liability Information System, California Environmental Reporting System, Hazardous Waste Sites, EnviroStor Database, EnviroStor Hazardous Waste Facilities, Resource Conservation and Recovery

Act, Corrective Action, RCRA Small Quantity Generators List, Superfund Enterprise Management System, Archived Site, and Toxics Release Inventory Program site.<sup>130</sup>

The Project's listing in these databases is associated with prior industrial uses on the Project Site, including Western Circuits, Inc. which conducted circuit board etching, plating, and fabrication activities, as further discussed above under the response to Checklist Question IX.a. To mitigate any potential impacts resulting from the Project Site's former industrial uses, as discussed under the response to Checklist Question IX.a, the Applicant would implement the recommendations provided in the Phase II ESA, including obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a Soils and Materials Management Plan (SMMP) during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, as set forth in MM HAZ-1.<sup>131</sup> With implementation of MM HAZ-1, existing human health risk impacts on site would be reduced to a less than significant level and the Project would not create a significant hazard to the public or environment, despite being included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, impacts would be reduced to a less than significant level.

**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 nearest airport to the Project Site is the Santa Monica Municipal Airport, which is located approximately 1.6 miles to the northeast. However, the Project Site is not located within the Airport Influence Area of the Santa Monica Municipal Airport.<sup>132</sup> Therefore, no impacts would occur, and no mitigation measures would be required.

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

**Less than Significant Impact.** The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities could occur in adjacent street rights-of-way during certain periods of the day. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with a Construction Management Plan that would be prepared for the Project and implemented to ensure adequate circulation and emergency access. Prior to issuance of a building permit, the Applicant would be required by the City

<sup>130</sup> Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, 4112 Del Rey Avenue, Marina Del Rey, California, 90292, April 20, 2022. Refer to Appendix H-1 of this SCEA.

<sup>131</sup> Geosyntec Consultants, Limited Phase II Environmental Site Assessment Results, 4112 Del Rey Avenue, Marina Del Rey, California, February 6, 2023. Refer to Appendix H-2 of this SCEA.

<sup>132</sup> Los Angeles County Airport Land Use Commission, Santa Monica Municipal Airport Influence Area, 2003, <https://planning.lacounty.gov/aluc/airports>, accessed August 19, 2022.

to develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan would include but not be limited to mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with City requirements, Project impacts related to adopted emergency plans would be less than significant. No mitigation measures would be required.

**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 that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project Site is not located within or near the vicinity of a designated Very High Fire Hazard Severity Zone (Very High FHSZ).<sup>133</sup> In addition, the Project Site is surrounded by urban development and not adjacent to any wildlands. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wild land fires. No impacts would occur, and no mitigation measures would be required.

**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 boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by the City, which would be responsible for assessing potential hazards risks associated with those related 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, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

**X. Hydrology and Water Quality**

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

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

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<sup>133</sup> California Department of Forestry and Fire Protection, Fire Hazard Severity Zone Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed August 16, 2022.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis is based on the information provided in the *Preliminary Hydrology & LID Study* (Hydrology and LID Study) prepared by David Evans and Associates Inc. in August 2022, and contained in Appendix I of this SCEA.

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

**Less than Significant Impact with Mitigation Incorporated.** Construction activities, such as earth moving, maintenance/operation of construction equipment, and handling/storage/disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. In addition, exposed and stockpiled soils could be

subject to wind and conveyance into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. The Applicant would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. BMPs would include, but would not necessarily be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs, with erosion control and drainage devices. In addition, the Project would be required to comply with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with all applicable federal, state, and local requirements would reduce the potential for Project construction to release contaminants into the groundwater that could affect existing contaminants, expand the area, or increase the level of groundwater contamination.

As discussed in the response to Checklist Question IX.a, TCE and *cis*-1,2-DCE were detected in groundwater samples taken from beneath the Project Site at concentrations above drinking water standards (also referred to as MCLs). Construction of the Project would require excavation up to a maximum depth of 7 feet bgs, which would be below the Project Site's historic groundwater level of 6 feet bgs. Compliance with applicable NPDES permitting requirements and LARWQCB waste discharge requirements as well as implementation of MM HAZ-1, which requires obtaining Oversight Agency approval of additional soil and groundwater investigations, the preparation and implementation of a SMMP during redevelopment activities, and the installation of a vapor barrier beneath the proposed new construction, would ensure that potential impacts related to groundwater quality would be reduced to a less than significant level. Therefore, with implementation of MM HAZ-1, Project construction activities would not violate any water quality standards or waste discharge requirements, and impacts would be less than significant.

During operation, the Project would generate stormwater runoff into the municipal storm drain system which may contain nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, and trash and debris. These pollutants most often originate from motor vehicle use and the associated deposition of fuel, oil and rubber on the ground surface, trash collection areas, landscape maintenance activities, pesticide and herbicide use, and general human activity.

The Project Site currently generates stormwater runoff from the on-site buildings, parking areas, and surface walkways. The proposed site drainage would mimic the existing conditions with overflow discharging onto Del Rey Avenue through curb drains.

During the Project's operational phase, approximately 2.4 acres, or 85 percent, of the 2.83-acre Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features. The Applicant would still be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance

applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. In addition, to comply with LID Ordinance, the Project would be required to capture and treat the first 3/4-inch of rainfall from a storm event or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater, in accordance with established stormwater treatment priorities. As discussed in the Hydrology and LID Study, to meet the City's LID and stormwater quality requirements, Permavoid devices and trench drains/area drains would be installed to mitigate low flow and treatment for the required LID volumes. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

**Less than Significant Impact.** The Project Site is currently entirely developed with impervious surface, including buildings and paved parking areas. All stormwater that encounters the Project Site is directed to the City's local storm drain system. During construction, excavation would occur up to a maximum depth of 7 feet bgs, which would be below the Project Site's historic groundwater level of 6 feet bgs. If groundwater is encountered during Project construction, temporary dewatering would be required and disposed of in accordance with the NPDES permit and requirements. During Project operation, most of the Project Site would also be developed with impervious surfaces, and all stormwater would be directed toward BMP features and/or the local storm drain system. Dewatering would not be required during operation of the Project. Potable water would be provided to the Project from the LADWP's existing water supply sources. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Therefore, impacts related to groundwater recharge would be less than significant, and no mitigation measures would be required.

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

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

**Less than Significant Impact.** The Project includes demolition and removal of all existing uses from the Project Site and development of the Project Site with a six-story mid-rise building consisting of 210 residential units and 33,793 square feet of open space. No rivers or streams are located on or near the Project Site. During the Project's construction phase, soil would be exposed. The Applicant would be required to submit a LID Plan to LASAN Watershed Protection Division for review and approval prior to the issuance of grading permits. The LID Plan would be prepared consistent with the

requirements of the Development Best Management Practices Handbook. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. While grading and construction activities may temporarily alter the existing drainage patterns of the Project Site, compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. . In addition, the Applicant would be required to comply with the City's LID Ordinance during operation, which would reduce the amount of surface water runoff leaving the Project Site after a storm event. Specifically, the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater. To meet the City's LID and stormwater quality requirements, Permeable devices and trench drains/area drains would be installed to mitigate low flow and treatment for the required LID volumes.<sup>134</sup> Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. Therefore, Project impacts related to erosion or siltation would be less than significant.

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

***(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?***

**Less than Significant Impact.** Construction activities for the Project would include demolition of the existing buildings and hardscape on site and excavating down to a maximum depth of 7 feet bgs. These construction activities have the potential to temporarily alter existing drainage patterns and flows on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, the Project would be required to comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. In addition, Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. Adherence to these standard compliance measures in construction activities would avoid flooding, substantially increasing or decreasing the amount of surface water flow from the Project Site into a water body, or a permanent, adverse change to the movement of surface water. Furthermore, the Project Site is not within a 100-year or 500-year flood hazard area according to Federal Emergency

<sup>134</sup> David Evans and Associates Inc., Preliminary Hydrology and LID Study, 4112-4136 Del Rey Avenue, August 2022. Refer to Appendix I of this SCEA.

Management Agency's (FEMA) Flood Insurance Rate Map, further reducing the potential impacts from flood events.<sup>135</sup> As such, construction-related impacts to surface water hydrology would be less than significant.

During Project operations, the Project would decrease the percentage of impervious area compared to the existing conditions on the Project Site. The Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking, which would be replaced by a residential building surrounded by hardscaping, landscaping, and courtyard plantings. The Project Site would be approximately 85 percent impervious after construction.

The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including Permavoid devices and trench drains/area drains, throughout the Project Site.<sup>136</sup> The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Therefore, the Project would not increase the chances of flooding compared to the preexisting development during a 50-year developed storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Operation-related impacts to surface water hydrology would be less than significant, and no mitigation measures would be required.

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

**Less than Significant Impact.** A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes.

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<sup>135</sup> Federal Emergency Management Agency (FEMA), FEMA Flood Map Service Center, Information for 4112 Del Rey Avenue, Los Angeles, <https://msc.fema.gov/portal/search?AddressQuery=2311%20North%20Hollywood%20Way%2C%20urbank#searchresultsanchor>, accessed September 2, 2022.

<sup>136</sup> David Evans and Associates Inc., Preliminary Hydrology and LID Study, 4112-4136 Del Rey Avenue, August 2022. Refer to Appendix I of this SCEA].

As stated above, the Project Site is not located within a 100-year or 500-year flood hazard area designated by FEMA.<sup>137</sup> The Project Site is located approximately 1.6 miles inland (east) from the Pacific Ocean; however, the Project Site is not located within a tsunami hazard area as mapped by the California Department of Conservation.<sup>138</sup> Additionally, there are no levees or dams in the Project vicinity and flooding due to the failure of a levee or dam is unlikely. The seiche risk at the Project Site is considered remote as no major water-retaining structures or land-locked bodies of water are located immediately up gradient from the Project Site.<sup>139</sup>

Since the Project Site is not within a flood hazard, tsunami or seiche zone, there would be minimal, if any, risk or release of pollutants due to Project inundation. Therefore, impacts would be less than significant, and no mitigation measures would be required.

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

**Less than Significant Impact.** As discussed above, the Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Therefore, Project impacts would be less than significant, and no mitigation measures would be required.

**Cumulative Impacts**

The site of the Proposed Project and the related 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

<sup>137</sup> FEMA, FEMA Flood Map Service Center, Information for 4112 Del Rey Avenue, Los Angeles, <https://msc.fema.gov/portal/search?AddressQuery=2311%20North%20Hollywood%20Way%2C%20Burbank#searchresultsanchor>, accessed September 2, 2022.

<sup>138</sup> California Department of Conservation, Tsunami Inundation Map, <https://www.conservation.ca.gov/cgs/tsunami/maps>, accessed September 2, 2022.

<sup>139</sup> Twining Consulting, Geotechnical Report, Proposed Del Rey Avenue Building, August 30, 2022. Refer to Appendix E of this SCEA.

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

## XI. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### a. Physically divide an established community?

**Less than Significant Impact.** The Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. The Project vicinity is highly urbanized, generally built out, and surrounded by a variety of land uses including commercial, residential, and industrial uses. As such, the Project would represent redevelopment and infill development of an already fully developed site, with a residential use. Furthermore, the Project would include new open space areas for the residents, which would improve pedestrian connectivity around and through the Project Site. The Project would encourage multiple modes of travel by providing bicycle access and parking, as well as being located within close proximity to public transit stops. Therefore, the Project would not physically divide an established community, and impacts would be less than significant. No mitigation measures would be required.

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

**Less than Significant Impact.** As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Therefore, no impacts related to land use and planning would occur as a result of the Project. No mitigation measures would be required.

### Regional Plans

#### *Southern California Association of Governments (SCAG)*

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000

square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

### SCAG Connect SoCal 2020

SB 375 requires MPOs, such as SCAG, to revise and update their RTPs and SCS periodically. SCAG's most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is Connect SoCal 2020, which was adopted on September 3, 2020, by SCAG's Regional Council.

Connect SoCal 2020 is a long-range vision plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal 2020 charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians.

Connect SoCal 2020 outlines more than \$638 billion in transportation system investments through 2045 and was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura. Connect SoCal 2020 includes strategies for accommodating projected population, household, and employment growth in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with a reduced dependence on automobiles and an increase growth in walkable, mixed-use communities and high quality transit areas and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

### Connect SoCal 2020 Consistency Discussion

The Project's consistency with Connect SoCal 2020 is discussed in Table 3-1 in Chapter 3, *SCEA Criteria and TPP Consistency Analysis*, of this SCEA. As discussed in Chapter 3, the Project would be substantially consistent with Connect SoCal 2020. Therefore, impacts related to consistency with Connect SoCal 2020 would be less than significant.

### *South Coast Air Quality Management District*

#### Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control



strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Therefore, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

### AQMP Consistency Discussion

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in the response to Checklist Question III.a.

### **Local Plans**

#### *City of Los Angeles*

#### General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire city. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use

Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

### Land Use Element Consistency Discussion

The Project's consistency with the General Plan Framework Element is discussed in **Table 5-13, Project Consistency with Applicable Policies of the Framework Element**. As shown, the Project would be substantially consistent with the Framework Element. Therefore, Project impacts related to consistency of the Project with the Framework Element would be less than significant.

**TABLE 5-13  
PROJECT CONSISTENCY WITH APPLICABLE POLICIES OF THE FRAMEWORK ELEMENT**

Goals, Objectives, and Policies	Project Consistency
<b>Land Use</b>	
<b>Distribution of Land</b>	
<b>GOAL 3A</b> <i>A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.</i>	
<b>Objective 3.1</b> <i>Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.</i>	
<b>Policy 3.1.1</b> Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	<b>Consistent.</b> The Project includes development of the Project Site with a residential building with 210 dwelling units, 18 of which would be restricted to VLI Households. The unit types would consist of 33 studio, 108 one-bedroom, 53 two-bedroom, and 16 three-bedroom. Therefore, the Project would help to serve the City's housing land use needs.
<b>Policy 3.1.2</b> Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	<b>Consistent.</b> As discussed in Sections XV, Public Services, XVII, Transportation, and XIX, Utilities and Service Systems, existing public infrastructure and services would be adequate to accommodate the Project.
<b>Objective 3.2</b> <i>Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.</i>	
<b>Policy 3.2.1</b> Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are	<b>Consistent.</b> The Project includes development of 210 multi-family residential units, including 18 VLI units at the Project Site near concentrations of

Goals, Objectives, and Policies	Project Consistency
<p>differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.</p>	<p>employment, shopping, and transit. The Project Site is surrounded by a mix of commercial and residential uses and as such, the Project would fit within the pattern of land use development in the area.</p>
<p><b>Policy 3.2.3</b> Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p><b>Consistent.</b> The Project includes development of the Project Site with a residential building with 210 dwelling units.</p> <p>The Project would include 142 bicycle parking spaces. Further, the Project would include a pedestrian friendly design with the proposed Level 1 Courtyard that would serve to activate Del Rey Avenue and would allow for better pedestrian access to the surrounding area.</p> <p>Therefore, the Project would fit into the existing pattern of land use development in the area that allows for pedestrian/bicycle access.</p>
<p><b>Objective 3.3</b> <i>Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</i></p>	
<p><b>Policy 3.3.1</b> Accommodate projected population and employment growth in accordance with the Long-Range Land Use Diagram and forecasts in Table 2- 2 (see Chapter 2: Growth and Capacity), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.</p>	<p><b>Consistent.</b> As discussed in detail in the response to Checklist Question XIV.a, the Project’s population and housing growth would fall within the forecasted growth for the City. Therefore, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City.</p>
<p><b>Policy 3.3.2</b> Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area.</p>	<p><b>Consistent.</b> As discussed in the response to Checklist Question XIV.a, the Project’s population and housing growth would fall within the forecasted growth for the City. Therefore, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City.</p> <p>As discussed in Sections XV, Public Services, XVII, Transportation, and XIX, Utilities and Service Systems, existing public infrastructure and services would be adequate to accommodate the Project.</p>
<p><b>Objective 3.4</b> <i>Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</i></p>	
<p><b>Policy 3.4.1</b> Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated</p>	<p><b>Consistent.</b> The Project includes development of 210 multi-family residential units, with 18 VLI units on a site near concentrations of employment, shopping, and transit. The Project Site area is</p>

Goals, Objectives, and Policies	Project Consistency
commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	served by Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7. The Project would not impede on any existing residential neighborhoods.
SOURCE: City of Los Angeles General Plan Framework Element, adopted December 11, 1996, readopted August 8, 2001; ESA, 2022.	

### Palms -Mar Vista – Del Rey Community Plan

The Palms-Mar Vista-Del Rey CPA contains 5,257 acres, which is approximately two percent of the land in the City. The CPA is located in the western portion of the City with roughly irregular boundaries. The terrain varies from flat land in the southern section to rolling hillside in the north. The community is bisected by a narrow strip of the City of Culver City along Washington Boulevard. The northern section proceeding in a clockwise direction is bounded by the City of Santa Monica, Pico Boulevard, southerly along the San Diego Freeway up to National Boulevard, Exposition Boulevard and Southern Pacific Railroad Company line, Robertson Boulevard up to National Boulevard, Venice Boulevard, Washington Boulevard, City of Culver City and Walgrove Avenue. The southern section, in a clockwise direction, is bounded by Del Rey Avenue, City of Culver City, Centinela Avenue, Jefferson Boulevard and Lincoln Boulevard. The CPA is surrounded by the communities of Venice, West Los Angeles, West Adams - Baldwin Hills - Leimert Park, Westchester-Playa Del Rey and the Cities of Santa Monica and Culver City. The predominant land use in the community is residential with most of the low-density residential development located west of Sawtelle Boulevard and between Sepulveda Boulevard and Overland Avenue, north of Rose Avenue. The majority of the multi-family development of medium and high medium density is in areas located in the northeast area of the community east of Sawtelle Boulevard.

The Project's consistency with the Palms-Mar Vista-Del Rey Community Plan is discussed in **Table 5-14, *Project Consistency with the Palms-Mar Vista-Del Rey Community Plan***. As shown, the Project would be consistent with the Palms-Mar Vista-Del Rey Community Plan. Therefore, Project impacts related to consistency of the Project with the Palms-Mar Vista-Del Rey Community Plan would be less than significant.

**TABLE 5-14**  
**PROJECT CONSISTENCY WITH THE PALMS -MAR VISTA – DEL REY COMMUNITY PLAN**

Policies	Project Consistency
<b>Residential</b>	
<b>GOAL 1 A</b> <i>Safe, secure, and high quality residential environment for all community residents.</i>	
<b>Objective 1-1</b> <i>To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.</i>	
<b>Policy 1-1.1</b> Provide for adequate multi-family residential development.	<b>Consistent.</b> The Project includes development of the Project Site with a residential building with 210 dwelling units, 18 of which would be restricted to VLI Households. The unit types would consist of 33 studio, 108 one-bedroom, 53 two-bedroom, and 16 three-bedroom units, providing a variety of housing options within the CPA.
<b>Policy 1-1.2</b> Protect the quality of residential environment and the appearance of communities with attention to site and building design.	<b>Consistent.</b> The Project includes development of the Project Site with a residential building that would be complimentary in style and design to the surrounding uses including the existing multi-family apartment building directly north of the Project Site.
<b>Policy 1-1.4</b> Promote neighborhood preservation, particularly in multi-family neighborhoods.	<b>Consistent.</b> The Project includes development of a multi-family residential building on a site currently improved with commercial buildings and adjacent to existing multi-family residential development of compatible size and scale. Therefore, the Project would not disrupt existing residential neighborhoods.
<b>Objective 1-2</b> <i>To reduce vehicular trips and congestion by developing new housing in proximity to services and facilities.</i>	
<b>Policy 1-2.1</b> Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	<b>Consistent.</b> The Project includes development of 210 multi-family residential units, with 18 VLI units on a site near concentrations of employment, shopping, and transit. The Project Site area is served by Big Blue Bus lines 3, Rapid 3, and 16 and Culver CityBus lines CC-1, CC-2, CC-5, and CC-7.
<b>Objective 1-3</b> <i>To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.</i>	
<b>Policy 1-3.1</b> Require architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	<b>Consistent.</b> The Project includes development of the Project Site with a residential building that would be complimentary in style and design to the surrounding uses including the existing multi-family apartment building directly north of the Project Site.
<b>Objective 1-4</b> <i>To promote the adequacy and affordability of multiple-family housing and increase its accessibility to more segments of the population.</i>	
<b>Policy 1-4.1</b> Promote greater individual choice in type, quality, price and location of housing.	<b>Consistent.</b> The Project includes development of 210 multi-family residential units, with 18 VLI units on a site near concentrations of employment, shopping, and transit.

Policies	Project Consistency
<b>Recreation and Park Facilities</b>	
<b>GOAL 4</b> Adequate recreation and park facilities which meet the needs of the residents in the plan area.	
<b>Objective 4-1</b> To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community.	
Policy 4-1.1 Preserve and improve the existing recreational facilities and park space.	<b>Consistent.</b> The Project would not affect any existing recreational facilities or park space. In addition, as discussed in response to Checklist Question XV.d, in accordance with Ordinance No. 184,505, the Applicant would be required to comply with the requirements of the City's Parks Fee ordinance which would mitigate the Project's demand for parks and recreational facilities.
<b>Police Protection</b>	
<b>GOAL 8 A</b> Community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidents of crime and the provision of other necessary law enforcement services.	
<b>Objective 8-1</b> To provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.	<b>Consistent.</b> As discussed below in response to Checklist Question XV.b, existing police facilities and personnel are sufficient to accommodate the Project's proposed residential growth.
<b>Objective 8-2</b> To increase the community's and the Police Department's ability to minimize crime and provide security for all residents.	
<b>Policy 8-2.2</b> Ensure adequate lighting around residential, especially multi-family, commercial and industrial buildings to improve security.	<b>Consistent.</b> The Project would provide lighting in accordance with LAMC and LAPD requirements.
<b>Fire Protection</b>	
<b>GOAL 9</b> Protect the community through a comprehensive fire and life safety program.	
<b>Objective 9-1</b> Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.	<b>Consistent.</b> As discussed below in response to Checklist Question XV.a, existing fire facilities are sufficient to accommodate the Project's proposed residential growth, and the Project would undergo review and approval by the Fire Department as part of the Project's plan check process to ensure compliance with applicable fire and life safety standards.
SOURCE: City of Los Angeles, <i>Palms -Mar Vista – Del Rey Community Plan</i> , September 16, 1997; ESA, 2022.	

## Cumulative Impacts

As discussed previously, 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 related projects with all applicable plans, policies, and regulations associated with those projects, individually. Regardless

of any potentially inconsistencies the related 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.

## XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** According to the Conservation Element of the City’s General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the floodplain between the San Fernando Valley and downtown Los Angeles.<sup>140</sup>

The Project Site is not classified by the City as containing significant mineral deposits.<sup>141</sup> Furthermore, the Project Site is not designated as an existing mineral resource extraction area by the California Geological Survey.<sup>142</sup> In addition, the Project Site is not designated or zoned for mineral extraction uses.<sup>143,144,145</sup> Therefore, the chances of uncovering mineral resources during construction and grading would be minimal. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts would occur and no mitigation measures would be required.

<sup>140</sup> City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, September 26, 2001, <https://planning.lacity.org/plans-policies/general-plan-overview>, accessed August 15, 2022.

<sup>141</sup> City of Los Angeles, Department of City Planning, Citywide General Plan Framework, Final Environmental Impact Report, June 1996, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles.

<sup>142</sup> California Geological Survey, Aggregate Sustainability in California, California, 2018.

<sup>143</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4112 and 4120 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>144</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4130 and 4132 A-B South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

<sup>145</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 4134 and 4136 South Dey Rey Avenue, <http://zimas.lacity.org/>, accessed August 12, 2022.

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

**No Impact.** As discussed above, the Project Site does not contain mineral deposits and is not designated as a mineral resource extraction area by the California Geological Survey. The Project Site is fully developed with urban uses and is not zoned for mineral extraction uses. Therefore, Project implementation would not 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 impacts would occur and no mitigation measures would be required.

**Cumulative Impacts**

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related 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.

**XIII. Noise**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



The analysis is based on the information provided in the *Noise and Vibration Technical Report* prepared by ESA in October 2022, and contained in Appendix J, as well as the Project-specific transportation assessment contained in Appendix K, of this SCEA.

### **Ambient Noise Levels**

The predominant existing noise source surrounding the Project Site is traffic noise from Lincoln Boulevard, Del Rey Avenue, and other local streets. Secondary noise sources include general commercial-related activities, such as loading dock/delivery truck activities, trash compaction, and refuse service activities, from the surrounding commercial land uses.

Ambient noise measurements were taken at five locations, representing the nearby sensitive land uses in the vicinity of the Project Site to establish conservative ambient noise levels. The measurement locations, along with existing development, are shown on Figure 4 of the Noise and Vibration Technical Report. Short-term (15-minute) noise measurements were taken at locations R1 through R8 on September 27th, 2022. Appendix A of the Noise and Vibration Technical Report includes the details about the ambient noise monitoring.

The ambient noise measurements were conducted using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of 5 feet above the local grade, at the following locations as shown in Figure 4 of the Noise and Vibration Technical Report:

- Measurement Location R1: This measurement location represents the existing noise environment of the area to the northwest (975 feet), along Carter Avenue residential uses, behind commercial uses (Jet Nails and Spa, Marina Bay Watch Company, etc.) along Lincoln Boulevard. The sound level meter was placed adjacent to these sensitive receiver sites.
- Measurement Location R2: This measurement location represents residential uses to the northwest of the Project Site (540 feet), along Carter Avenue, behind Felipes' Carwash.
- Measurement Location R3: This measurement location represents the existing noise environment of the residential uses along Berkeley Drive west of the Project Site (430 feet), at the corner of Carter Avenue and Berkeley Drive.
- Measurement Location R4: This measurement location represents the existing noise environment of an apartment complex along Lincoln Boulevard, south of the Project Site (415 feet).
- Measurement Location R5: This measurement location represents the existing noise environment of an apartment complex south/southeast of the Project Site along Del Rey (215 feet).

- **Measurement Location R6:** This measurement location represents the existing noise environment of Tribeca Urban Apartments, north of the Project Site (25 feet).
- **Measurement Location R7:** This measurement location represents the existing noise environment of multi-family residential uses at Belle Fontaine Apartments to the north/northeast of the Project Site (430 feet) along Glencoe Avenue.
- **Measurement Location R8:** This measurement location represents the existing noise environment of X67 Loft multi-family residential uses to the east of the Project Site (200 feet) along Glencoe Avenue.

A summary of noise measurement data is provided in **Table 5-15, Summary of Ambient Noise Measurements**. Daytime noise levels ranged from 53.6 dBA to 74.1 dBA  $L_{eq}$ .

**TABLE 5-15**  
**SUMMARY OF AMBIENT NOISE MEASUREMENTS**

Location and Existing Land Uses	Measured Ambient Noise Levels (dBA) <sup>a</sup>		
	$L_{eq}$	Lmax	Lmin
R1, Residential	59.6	74.5	52.4
R2, Residential	60.3	81.1	49.6
R3, Residential	57.4	68.3	45.9
R4, Residential	74.1	92.5	54.4
R5, Residential	60.4	72.5	52.5
R6, Residential	53.6	62.3	49.9
R7, Residential	66.0	76.9	49.4
R8, Residential	66.9	76.7	50.1

<sup>a</sup> Detailed measured noise data is included in Appendix A of the Noise and Vibration Technical Report (Appendix J).

SOURCE: ESA, 2022.

**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 with Mitigation Incorporated.**

**Construction**

*On-Site Construction Noise*

The Project would be constructed using typical construction techniques; no blasting or impact pile driving would be used. As discussed in Chapter 2, *Project Description*, construction is anticipated to begin in 2024 with full build out in late 2026.

Project construction would require the use of mobile heavy equipment with high noise-level characteristics. Individual pieces of construction equipment expected to be used during Project construction could produce maximum noise levels of 75 dBA to 85 dBA  $L_{max}$  at a reference distance of 50 feet from the noise source, as shown in **Table 5-16, Construction Equipment Noise Levels**. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table 5-16. The usage factors are based on the Federal Highway Administration's (FHWA) Roadway Construction Noise Model User's Guide.<sup>146</sup> To more accurately characterize construction-period noise levels, the average (Hourly  $L_{eq}$ ) noise level associated with each construction stage has been calculated based on the quantity, type, and usage factors for each type of equipment expected to be used during each construction stage assuming that multiple pieces of equipment are operating, simultaneously. Additionally, overlapping construction phase (building construction, paving, and architectural coating) noise levels were combined to estimate the maximum construction noise level during a worst-case scenario.

**TABLE 5-16  
CONSTRUCTION EQUIPMENT NOISE LEVELS**

<b>Equipment</b>	<b>Estimated Usage Factor, %</b>	<b>Maximum Noise Level at 50 feet from Equipment, dBA (<math>L_{max}</math>)</b>
All Other Equipment > 5 HP	50	85
Air Compressor	50	78
Compactor	20	83
Concrete pump truck	20	81
Crane	40	81
Dump/Haul Truck	20	76
Excavator	40	81
Forklift	10	75
Front-end Loader	40	80
Generator	50	81
Grader	40	85
Man Lift	20	85
Paver	50	77
Pavement Scarafier	20	85
Pump	50	81
Roller	20	80
Rubber Tired Dozer	40	82
Tractor/Loader/Backhoe	25	80

SOURCE: FHWA Roadway Construction Noise Model User's Guide, 2006.

A summary of construction noise impacts at existing nearby sensitive receptors is provided in **Table 5-17a, Estimated Unmitigated Construction Noise Levels at Existing**

<sup>146</sup> Federal Highway Administration, Roadway Construction Noise Model User's Guide, 2006.

*Off-Site Sensitive Receptors.* As shown, unmitigated construction noise levels would exceed the threshold of significance at noise-sensitive receptor location R6, as the unmitigated construction noise level would exceed 5 dBA Leq over the existing ambient noise level. Therefore, mitigation measures would be required. A summary of mitigated construction noise impacts at existing nearby sensitive receptors is provided in **Table 5-17b, Estimated Mitigated Construction Noise Levels at Existing Off-Site Sensitive Receptors.** Supporting calculations are provided in Appendix J of this SCEA. The mitigated noise levels presented in Table 5-17b account for noise attenuation associated with mufflers attached to the equipment, and reductions due to the noise barriers (16 to 20 feet high) described as part of the construction activities, with sufficient height to block the line-of-sight between the off-site sensitive receivers noise-sensitive receptor location R6 and active construction area on the Project Site. Some of the off-site receivers, such as single-family residential uses to the west, the Belle Fontaine Apartments to the northeast, the Westly on Lincoln multifamily residences to the south, and Jefferson at Marina Del Rey to the west, and X67 Lofts multifamily residential uses to the east, would be shielded by intervening buildings (-15 dBA) between the Project Site and these off-site receivers. Those off-site receivers that would be shielded from the Project's construction noise by intervening buildings account for the noise reductions in both the unmitigated and mitigated analyses.

Mitigation Measure MM-NOISE-1 requires noise to be reduced by 25.5 dBA at the noise-sensitive receptors located directly to the north of the Project Site (e.g., Tribeca Urban Apartments at location R6) by requiring temporary noise barriers, which may be equipped with sound blankets or sound curtains that are capable of achieving the reduction, or a combination of temporary noise barriers and other noise-reducing strategies as specified in the mitigation measure. As shown in Table 5-17b, mitigated construction noise levels are estimated to remain at or below the significance thresholds at all off-site sensitive receiver locations in the Project vicinity. Therefore, construction noise impacts would be mitigated to a less-than-significant level.

Project construction activities would also not occur between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday; 7:00 P.M. and 9:00 A.M. on Saturdays; 7:00 P.M. and 10:00 A.M. on Sundays in accordance with the City's Municipal Code. Therefore, on-site construction noise impacts would not exceed standards established in the local general plan or noise ordinance.

**TABLE 5-17a  
ESTIMATED UNMITIGATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS**

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly L <sub>eq</sub> (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R1 Represents the residential uses to the northwest of the Project Site, along Carter Avenue, behind commercial uses (Jet Nails and Spa, Marina Bay Watch Company, etc.) along Lincoln Boulevard.	Demolition	975 to 1,450 feet	59.6	64.6		38	No
	Grading/Excavation					41	
	Mat Foundation/ Concrete Pour					43	
	Building Construction				-15	41	
	Paving				(Intervening building attenuation)	39	
	Architectural Coating					40	
	<b>Maximum Noise Level</b>					<b>43</b>	
R2 Represents the residential uses to the northwest of the Project Site, along Carter Avenue, behind Felipes's Carwash.	Demolition	540 to 1,050 feet	60.3	65.3		43	No
	Grading/Excavation					45	
	Mat Foundation/ Concrete Pour				-15	47	
	Building Construction				(Intervening building attenuation)	44	
	Paving					42	
	Architectural Coating					44	
	<b>Maximum Noise Level</b>					<b>47</b>	
R3 Represents the residential uses along Berkeley Drive west of the Project Site, at the corner of Carter Avenue and Berkeley Drive.	Demolition	430 to 815 feet	57.4	62.4		45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour				-15	48	
	Building Construction				(Intervening building attenuation)	47	
	Paving					44	
	Architectural					46	
	<b>Maximum Noise Level</b>					<b>48</b>	

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly L <sub>eq</sub> (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R4 Represents the residential uses and church along Lincoln Boulevard, south of the Project Site.	Demolition	415 to 915 feet	74.1	79.1	-15 (Intervening building attenuation)	45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour					48	
	Building Construction					46	
	Paving					44	
	Architectural Coating					46	
	<b>Maximum Noise Level</b>					<b>48</b>	
R5 Represents the residential uses to the south/southeast of the Project Site along Del Rey.	Demolition	215 to 525 feet	60.4	65.4	-15 (Intervening building attenuation)	50	No
	Grading/Excavation					53	
	Mat Foundation/ Concrete Pour					54	
	Building Construction					51	
	Paving					49	
	Architectural Coating					51	
<b>Maximum Noise Level</b>	<b>54</b>						
R6 Represents the residential uses (e.g., Tribeca Urban Apartments) to the north of the Project Site.	Demolition	25 to 315 feet	53.6	58.6	0	83	Yes
	Grading/Excavation					83	
	Mat Foundation/ Concrete Pour					84	
	Building Construction					76	
	Paving					78	
	Architectural Coating					81	
<b>Maximum Noise Level</b>	<b>84</b>						

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly Leq (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R7 Represents the residential uses (e.g., Belle Fontaine Apartments) to the north/northeast of the Project Site along Glencoe Avenue.	Demolition	430 to 885 feet	66.0	71.0		45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour				-15	48	
	Building Construction				(Intervening building attenuation)	46	
	Paving					44	
	Architectural Coating					46	
	<b>Maximum Noise Level</b>				<b>48</b>		
R8 Represents the residential uses to the east of the Project Site along Glencoe Avenue.	Demolition	200 to 500 feet	66.9	71.9		45	No
	Grading/Excavation					48	
	Mat Foundation/ Concrete Pour				-15	49	
	Building Construction				(Intervening building attenuation)	47	
	Paving					45	
	Architectural Coating					47	
	<b>Maximum Noise Level</b>				<b>49</b>		

<sup>a</sup> Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors and are expected to last the entire duration of each construction phase.  
<sup>b</sup> Noise levels include a 15 dBA reduction from acoustic shielding from intervening buildings between the Project Site and off-site sensitive receivers analyzed.

Source: ESA, 2022.

**TABLE 5-17b**  
**ESTIMATED MITIGATED CONSTRUCTION NOISE LEVELS AT EXISTING OFF-SITE SENSITIVE RECEPTORS**

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly L <sub>eq</sub> (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R1 Represents the residential uses to the northwest of the Project Site, along Carter Avenue, behind commercial uses (Jet Nails and Spa, Marina Bay Watch Company, etc.) along Lincoln Boulevard.	Demolition	975 to 1,450 feet	59.6	64.6	-15 (Intervening building attenuation)	38	No
	Grading/Excavation					41	
	Mat Foundation/ Concrete Pour					43	
	Building Construction					41	
	Paving					39	
	Architectural Coating					40	
	<b>Maximum Noise Level</b>					<b>43</b>	
R2 Represents the residential uses to the northwest of the Project Site, along Carter Avenue, behind Felipe's Carwash.	Demolition	540 to 1,050 feet	60.3	65.3	-15 (Intervening building attenuation)	43	No
	Grading/Excavation					45	
	Mat Foundation/ Concrete Pour					47	
	Building Construction					44	
	Paving					42	
	Architectural Coating					44	
	<b>Maximum Noise Level</b>					<b>47</b>	
R3 Represents the residential uses along Berkeley Drive west of the Project Site, at the corner of Carter Avenue and Berkeley Drive.	Demolition	430 to 815 feet	57.4	62.4	-15 (Intervening building attenuation)	45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour					48	
	Building Construction					47	
	Paving					44	
	Architectural					46	
	<b>Maximum Noise Level</b>					<b>48</b>	



Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly L <sub>eq</sub> (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R4 Represents the residential uses and church along Lincoln Boulevard, south of the Project Site.	Demolition	415 to 915 feet	74.1	79.1	-15 (Intervening building attenuation)	45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour					48	
	Building Construction					46	
	Paving					44	
	Architectural Coating					46	
	<b>Maximum Noise Level</b>					<b>48</b>	
R5 Represents the residential uses to the south/southeast of the Project Site along Del Rey.	Demolition	215 to 525 feet	60.4	65.4	-15 (Intervening building attenuation)	50	No
	Grading/Excavation					53	
	Mat Foundation/ Concrete Pour					54	
	Building Construction					51	
	Paving					49	
	Architectural Coating					51	
	<b>Maximum Noise Level</b>					<b>54</b>	
R6 Represents the residential uses (e.g., Tribeca Urban Apartments) to the north of the Project Site.	Demolition	25 to 315 feet	53.6	58.6	-25.5 (MM-NOISE-1)	57.5	No
	Grading/Excavation					57.5	
	Mat Foundation/ Concrete Pour					58.5	
	Building Construction					50.5	
	Paving					52.5	
	Architectural Coating					55.5	
	<b>Maximum Noise Level</b>					<b>58.5</b>	

Noise Sensitive Receptor	Construction Phases	Distance between Nearest Receptor and Construction Site, feet	Existing Ambient Noise Level (dBA Leq)	Significance Threshold (dBA Leq)	Estimated Construction Noise Levels at Noise Sensitive Receptor by Construction Phase, <sup>a,b</sup> Hourly L <sub>eq</sub> (dBA)		Exceeds Significance Threshold?
					Attenuation	Noise Level	
R7 Represents the residential uses (e.g., Belle Fontaine Apartments) to the north/northeast of the Project Site along Glencoe Avenue.	Demolition	430 to 885 feet	66.0	71.0	-15 (Intervening building attenuation)	45	No
	Grading/Excavation					47	
	Mat Foundation/ Concrete Pour					48	
	Building Construction					46	
	Paving					44	
	Architectural Coating					46	
	<b>Maximum Noise Level</b>					<b>48</b>	
R8 Represents the residential uses to the east of the Project Site along Glencoe Avenue.	Demolition	200 to 500 feet	66.9	71.9	-15 (Intervening building attenuation)	45	No
	Grading/Excavation					48	
	Mat Foundation/ Concrete Pour					49	
	Building Construction					47	
	Paving					45	
	Architectural Coating					47	
	<b>Maximum Noise Level</b>					<b>49</b>	

<sup>a</sup> Estimated construction noise levels represent the worst-case condition when noise generators are located closest to the receptors and are expected to last the entire duration of each construction phase.

<sup>b</sup> Noise levels include a 15 dBA reduction from acoustic shielding from intervening buildings between the Project Site and off-site sensitive receivers analyzed.

Source: ESA, 2022.

### *Off-Site Construction Traffic Noise*

Delivery and haul truck trips would occur throughout the construction period, although no truck trips would occur between 8:00 PM and 8:00 AM Monday Through Friday, before 9:00 AM or after 7:00 PM on Saturday, or before 10:00 AM and 7:00 PM on Sunday.

The grading/excavation phase has the highest volume of haul trucks and therefore has the highest potential to cause a noise impact. The addition of up to 110 haul truck trips per day during the grading/excavation phases would result in a less than perceptible 3 dBA noise level increase and would not increase noise levels by a “clearly noticeable” increase of 5 dBA over the ambient condition because it would not cause a doubling of traffic levels and traffic-related sound energy. Based on the Project’s Transportation Assessment,<sup>147</sup> under Existing Conditions, existing traffic volumes along Del Rey Avenue between Washington and Maxella Avenue are approximately 24,040 average daily trips (ADT).<sup>148</sup> Even when applying a passenger car equivalent (PCE) ratio of 3.0 to the Project’s construction trucks, which would result in 429 PCE-adjusted haul truck trips (e.g.,  $143 \times 3.0 = 429$ ), traffic volumes would not double, which is necessary to result in a 3 dBA increase in traffic noise levels. During the remainder of the construction activities the maximum number of trucks accessing the Project Site would be less than 110 per day. Therefore, based on this additional supporting evidence, noise impacts from off-site construction traffic would be less than significant and no mitigation measures would be required.

### *Mitigation Measures*

The following mitigation measure shall be implemented during construction:

**MM NOISE-1:** The Project Applicant shall ensure that noise levels are reduced by 25.5 dBA Leq at the noise-sensitive receptors located directly to the north of the Project Site (e.g., Tribeca Urban Apartments). Noise reduction measures shall consist of one or more of the following measures or other similar measure or measures of equivalent noise reduction effectiveness:

- Temporary abatement techniques shall include the use of temporary and/or movable shielding for both specific and nonspecific operations. Temporary noise barriers shall be installed along the north side of the Project boundary to shield the nearest residences from construction noise, with a minimum height of 16 feet and a maximum height of 20 feet (above finished grade). Temporary noise barriers shall be made of plywood or other similar solid

<sup>147</sup> Gibson Transportation Consulting, Inc., Transportation Assessment for the 4112 Del Rey Avenue Residential Project, October 2022. Refer to Appendix K of the SCEA.

<sup>148</sup> The traffic volume of approximately 24,040 ADT was estimated based on the peak hour intersection volumes under Existing Conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art (2.0 Standard Approaches, [http://www.fhwa.dot.gov/planning/tmip/publications/other\\_reports/tod\\_modeling\\_procedures/ch02.cfm](http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm)).

material. Temporary noise barriers will be equipped with sound blankets or sound curtains rated at a sound transmission class (STC) capable of absorbing or attenuating noise attributable to construction equipment by 25.5 dBA. Optionally, a reduction of less than 25.5 dBA from the temporary noise barriers shall be allowed and sound blankets or sound curtains not required, as long as the barrier achieves a minimum reduction of 20 dBA and additional noise reduction measures are implemented (such as those below or other similar measure of equivalent noise reduction effectiveness) such that the total noise reduction at the noise-sensitive receptors located directly to the north of the Project Site (e.g., Tribeca Urban Apartments) sums to 25.5 dBA.

- Use construction equipment, fixed or mobile, that individually generates less noise than presumed in the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Examples of such equipment are medium, compact, small, or mini model versions of backhoes, cranes, excavators, loaders, or tractors; or newer model equipment; or other applicable equipment that are equipped with reduced noise-generating engines. Construction equipment noise levels shall be documented based on manufacturer's specifications. The construction contractor shall keep construction equipment noise level documentation on-site for the duration of Project construction.
- Noise-generating equipment operated at the Project Site shall be equipped with California industry standard noise control devices to effectively reduce noise levels, i.e., mufflers, lagging, and/or motor enclosures. All noise-generating equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The reduction in noise level from noise shielding and muffling devices shall be documented based on manufacturer's specifications. The construction contractor shall keep noise shielding and muffling device documentation on-site and documentation demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications on-site for the duration of Project construction.
- Impact tools used for Project construction shall be hydraulically or electrically powered wherever practicable to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where pneumatic tools are employed, quieter procedures shall be used such as an exhaust muffler on the compressed air exhaust and external jackets to minimize noise impacts.
- Buffer distances of noise and ground-borne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be implemented to minimize noise impacts.

- Construction and demolition activities shall be scheduled to avoid operating more than one piece of motorized equipment simultaneously within 15 feet of the adjacent sensitive receptor's property line.
- The effectiveness of the above strategies to achieve the required noise reduction levels shall be documented by on-site noise monitoring conducted by a qualified acoustical analyst using a Type 1 instrument in accordance with the American National Standards Institute (ANSI) S1.4. Noise monitoring shall be conducted during early Project construction activities when the use of heavy equipment is prevalent so long as it can be demonstrated to the City's satisfaction that later construction activities would achieve the requisite noise reductions.

## **Operation**

### *On-site Stationary Noise Sources*

#### Open Space Event Noise

The activity at onsite ground floor open space, where it is located internally on the west side of the building and completely shielded from receivers to the north that would provide a minimum of 25 dBA noise reduction, may generate audible noise levels. Therefore, ground floor open space noise would be substantially lower than the ambient noise that is currently present.

Similarly, the sky deck, including the pool deck, located on Level 6 of the residential building would generate noise. With shielding effect provided by the perimeter wall on the roof and distance attenuation provided for the off-site sensitive receivers, crowd noise would not be louder than the current ambient noise-based threshold. **Table 5-18, *On-Site Open Space Noise Levels***, lists the potential on-site open space noise level that would be experienced at off-site sensitive receptor locations. The sky deck, including the pool deck, would have a capacity of 435 people on the 6th floor based on occupancy levels provided by the Project applicant. It is further assumed that there would be 109 male adults, 108 female adults, and 218 children present as a worst-case scenario. Half of the population would be talking and the other half would be listening. With the adult population talking using a raised voice level of 65 dBA at 3 feet, and the children using a loud voice level of 76 dBA at 3 feet, the combined noise level would be equal to 96.7 dBA<sup>149</sup> at a distance of 3 feet. As shown in Table 5-18, incorporating distance attenuation measured from the approximate center of the sky deck and pool deck area to the receptor, and accounting for a 25 dBA noise attenuation from shielding by the Project building itself for those off-site receptors where the line-of-sight would be blocked, the crowd noise would not exceed the threshold at adjacent off-site sensitive receptor locations. Therefore, open space noise impacts would be less than significant.

<sup>149</sup>  $10 \text{ Log } [30 \times 10^{7.6} + 224 \times 10^{6.5}] = 93 \text{ dBA at a distance of 3.3 feet.}$

**TABLE 5-18  
ON-SITE OPEN SPACE NOISE LEVELS**

Off-site Receiver	Noise Levels (dBA Leq)				Significant Increase? <sup>b</sup>
	Sky Deck and Pool Deck <sup>a</sup>	Existing Ambient	Ambient + Project	Threshold	
R1	46	59.6	59.8	62.6	No
R2	50	60.3	60.7	63.3	No
R3	50	57.4	58.2	60.4	No
R4	30 <sup>c</sup>	74.1	74.1	77.1	No
R5	35 <sup>c</sup>	60.4	60.4	63.4	No
R6	43 <sup>c</sup>	53.6	53.7	56.6	No
R7	55	66.0	66.3	69.0	No
R8	50	66.9	67.0	69.9	No

## NOTES:

a Estimated pool deck noise assumes there are a total number of 435 people, with 218 children, 109 male adults, and 108 female adults with half of the population talking (adults using a raised voice level of 65 dBA at 3 feet and children using a loud voice level of 76 dBA at 3 feet).

b Threshold used for significant increase is 3 dBA for operational noise sources.

c Included 25 dBA from enclosure/shielding by the building itself.

SOURCE: ESA, 2022.

### Fixed Mechanical Equipment

The operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. It is not anticipated that the mechanical equipment would be significantly different than the mechanical equipment that is currently present in the project area. In addition, the Project's mechanical equipment would need to comply with the City's Municipal Code noise standards, which establish maximum permitted noise levels from mechanical equipment and prohibit any increase in ambient noise levels at neighboring properties by more than 5 dBA. Project compliance with the City's noise standards would ensure that operational noise impacts are less than significant.

### Parking Structure

Using the Federal Transit Administration (FTA)'s calculation for noise generated by parking lot traffic, the entering vehicles would create noise levels up to 46.5 dBA<sup>150</sup> at a

<sup>150</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. September 2018, Tables 4-13 and 4-14.

distance of 50 feet from the entrance of the parking structure. This value would be less than the measured ambient noise levels, 53.6 dBA to 74.1 dBA, at sensitive receivers in the Project vicinity. **Table 5-19, On-Site Parking Structure Noise Levels**, lists the estimated noise levels at the off-site receivers from the parking structure operations. The Project's parking areas would be centrally located, and the Project buildings would generally block the line-of-sight to off-site receivers. The noise calculations do not account for the noise reduction from the Project buildings at all of the off-site receiver locations and noise levels would be lower than shown in Table 5-19. Therefore, based on this analysis, the noise impacts from the parking structure would be less than significant.

**TABLE 5-19  
ON-SITE PARKING STRUCTURE NOISE LEVELS**

Off-site Receiver	Noise Levels (dBA Leq)				Significant Increase? <sup>b</sup>
	Parking Noise <sup>a</sup>	Existing Ambient	Ambient + Project	Threshold	
R1	26.5	59.6	59.6	62.6	No
R2	25.5	60.3	60.3	63.3	No
R3	27.5	57.4	57.4	60.4	No
R4	28.5	74.1	74.1	77.1	No
R5	33.3	60.4	60.4	63.4	No
R6	27.5 <sup>c</sup>	53.6	53.6	56.6	No
R7	27.5	66.0	66.0	69.0	No
R8	34.5	66.9	66.9	69.9	No

NOTES:

- a Estimated parking structure noise based on Tables 4-13 and 4-14 in FTA Transit Noise and Vibration Impact Assessment, September 2018.
- b Threshold used for significant increase is 3 dBA for operational noise sources.
- c Included 25 dBA from enclosure/shielding by the building itself.

SOURCE: ESA, 2022.

### Loading Area Noise and Refuse Collection

The loading activity and refuse collection area for the Project would be shielded from sensitive uses in the project vicinity. Based on a noise survey that was conducted at a loading dock and trash collection facilities by ESA, loading activity (namely idling semi-trucks and backup alarm beeps) and trash compactors could generate noise levels of approximately 70 dBA Leq and 66 dBA Leq, respectively, at a reference distance of 50

feet.<sup>151</sup> Loading activity/trash collection noise levels have been calculated at each sensitive receptor accounting for a 15 to 25 dBA reduction in noise level provided by the shielding from intervening buildings.<sup>152</sup> Loading activity and trash compaction would be reduced to 55 dBA  $L_{eq}$  or lower at the closest noise sensitive receptors. **Table 5-20, On-Site Loading and Refuse Collection Area Noise Levels**, lists the estimated noise levels at the off-site receivers from the loading operations. Therefore, the noise levels from the Project's loading dock and refuse collection area would be below the ambient noise levels captured at sensitive receptors in the Project vicinity and impacts would be less than significant.

**TABLE 5-20  
ON-SITE LOADING AND REFUSE COLLECTION AREA NOISE LEVELS**

Off-site Receiver	Noise Levels (dBA Leq)			Threshold	Significant Increase? <sup>b</sup>
	Loading and Refuse Noise <sup>a</sup>	Existing Ambient	Ambient + Project		
R1	44	59.6	59.7	62.6	No
R2	49	60.3	60.6	63.3	No
R3	51	57.4	58.3	60.4	No
R4	52	74.1	74.1	77.1	No
R5	57	60.4	62.0	63.4	No
R6	26 <sup>c</sup>	53.6	53.6	56.6	No
R7	51	66.0	66.1	69.0	No
R8	58	66.9	67.4	69.9	No

NOTES:

<sup>a</sup> Estimated loading operations noise based on ESA past project experience.

<sup>b</sup> Threshold used for significant increase is 3 dBA for operational noise sources.

<sup>c</sup> Included 25 dBA from enclosure/shielding by the building itself.

SOURCE: ESA, 2022.

### Composite Noise From On-site Stationary Operational Sources

Although it is not expected that all on-site stationary sources would occur at the same time, as a worst-case scenario, all on-site stationary operational noise levels are

<sup>151</sup> The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter ("SLM") in May 2003. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade.

<sup>152</sup> Federal Highway Administration, Noise Barrier Design Handbook, 2000, Section 3.4.2.



combined at off-site receiver locations, as shown below in **Table 5-21, On-Site Stationary Sources Composite Noise Levels**.

**TABLE 5-21  
ON-SITE STATIONARY SOURCES COMPOSITE NOISE LEVELS**

Off-site Receiver	Noise Levels (dBA Leq)			Threshold	Significant Increase? <sup>b</sup>
	Existing Estimated <sup>a</sup>	Existing Ambient	Ambient + Project		
R1	48.2	59.6	59.9	62.6	No
R2	52.5	60.3	61.0	63.3	No
R3	53.5	57.4	58.9	60.4	No
R4	52.0	74.1	74.1	77.1	No
R5	57.0	60.4	62.0	63.4	No
R6	43.2	53.6	54.0	56.6	No
R7	56.5	66.0	66.5	69.0	No
R8	58.7	66.9	67.5	69.9	No

NOTES:

a Estimated loading operations noise based on ESA past project experience.

b Threshold used for significant increase is 3 dBA for operational noise sources.

SOURCE: ESA, 2022.

### *Off-site Project Traffic*

#### Impacts Under Existing Traffic Baseline Conditions

Existing roadway noise levels were calculated along various roadway segments near to the Project Site. Roadway noise attributable to Project development was calculated using the traffic noise model previously described and was compared to baseline noise levels that would occur under the “No Project” condition.

Project impacts are shown in **Table 5-22, Off-Site Traffic Noise Impacts – Existing Conditions** with supporting calculation files provided in Appendix J of this SCEA.

As indicated, the maximum increase in Project-related traffic noise levels over existing traffic noise levels would be 0.1 dBA Community Noise Equivalent Level (CNEL), which would occur along 5 roadway segments. This increase in noise level would be below the barely perceptible threshold of 3 dBA and well below a “clearly noticeable” increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in sound level would be substantially lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases compared to existing conditions would be less

than the applicable threshold and therefore less than significant, and no mitigation measures would be required.

**TABLE 5-22  
OFF-SITE TRAFFIC NOISE IMPACTS- EXISTING CONDITIONS**

Roadway Segment	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup>		
	Existing	Existing + Project	Difference
<b>Del Rey Avenue</b>			
Between Washington Blvd and Maxella Ave	72.7	72.7	0.0
n/o Washington Blvd	60.9	61.0	0.1
<b>Glencoe Avenue</b>			
Between Washington Blvd and Maxella Ave	70.2	70.2	0.0
s/o Maxella Ave	71.0	71.1	0.1
<b>Lincoln Boulevard</b>			
Between Washington Blvd and Maxella Ave	72.1	72.1	0.0
n/o Washington Blvd	74.9	74.9	0.0
s/o Maxella Ave	72.1	72.1	0.0
<b>Maxella Avenue</b>			
Between Del Rey Ave and Glencoe Ave	67.3	67.4	0.1
Between Lincoln Blvd and Del Rey Ave	67.8	67.9	0.1
e/o Glencoe Ave	66.0	66.1	0.1
w/o Lincoln Blvd	68.0	68.0	0.0
<b>Washington Boulevard</b>			
Between Del Rey Ave and Glencoe Ave	71.1	71.1	0.0
Between Lincoln Blvd and Del Rey Ave	71.3	71.3	0.0
e/o Glencoe Ave	71.7	71.7	0.0
w/o Lincoln Blvd	71.7	71.7	0.0
SOURCE: Gibson Transportation Consulting, 2022; ESA, 2022.			

### Impacts Under Future Cumulative Traffic Conditions

Future cumulative roadway noise levels were also calculated along various roadway segments near the Project to establish future baseline traffic noise levels that would occur with implementation of the related projects in the Project’s vicinity, to which the Project’s off-site traffic noise during operations could be added. Project impacts are shown in **Table 5-23, Off-Site Traffic Noise Impacts – Future Cumulative Conditions**. As indicated, the maximum increase in Project-related traffic noise levels over the future traffic noise levels would be 0.1 dBA CNEL, along Maxella Avenue between Lincoln Boulevard and Del Rey Avenue. This increase in noise level would be less than a “clearly noticeable” increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in noise would be substantially lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases, when measured against the future cumulative conditions, would be less than the applicable threshold and therefore less than significant.

**TABLE 5-23  
OFF-SITE TRAFFIC NOISE IMPACTS- FUTURE CUMULATIVE CONDITIONS**

Roadway Segment	Cumulative CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup>		
	Cumulative	Cumulative + Project	Difference
<b>Del Rey Avenue</b>			
Between Washington Blvd and Maxella Ave	73.2	73.2	0.0
n/o Washington Blvd	56.9	56.9	0.0
<b>Glencoe Avenue</b>			
Between Washington Blvd and Maxella Ave	70.8	70.8	0.0
s/o Maxella Ave	71.6	71.6	0.0
<b>Lincoln Boulevard</b>			
Between Washington Blvd and Maxella Ave	72.4	72.4	0.0
n/o Washington Blvd	74.6	74.6	0.0
s/o Maxella Ave	73.0	73.0	0.0
<b>Maxella Avenue</b>			
Between Del Rey Ave and Glencoe Ave	68.3	68.3	0.0
Between Lincoln Blvd and Del Rey Ave	68.7	68.8	0.1
e/o Glencoe Ave	65.6	65.6	0.0
w/o Lincoln Blvd	65.7	65.7	0.0

Roadway Segment	Cumulative CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup>		
	Cumulative	Cumulative + Project	Difference
<b>Washington Boulevard</b>			
Between Del Rey Ave and Glencoe Ave	71.6	71.6	0.0
Between Lincoln Blvd and Del Rey Ave	71.8	71.8	0.0
e/o Glencoe Ave	72.9	72.9	0.0
w/o Lincoln Blvd	72.2	72.2	0.0

SOURCE: Gibson Transportation Consulting, 2022; ESA, 2022.

### Comparison between Existing and Cumulative Traffic Conditions

Future cumulative roadway noise levels were compared to the existing traffic noise levels along various roadway segments near the Project to show the future traffic noise level increases with growth in the Project area with implementation of the related projects in the Project's vicinity, to which the Project's off-site traffic noise during operations could be added. Project impacts are shown in **Table 5-24, Off-Site Traffic Noise Impacts – Comparison between Existing and Cumulative Conditions**. Along some roadway segments, traffic noise levels under the cumulative conditions would be lower than under the existing conditions. As indicated, the maximum increase in growth-related traffic noise levels over the existing traffic noise levels would be 1.2 dBA CNEL, along Washington Boulevard east of Glencoe Avenue. This increase in noise level would be less than a “clearly noticeable” increase of 5.0 dBA CNEL in an area characterized by normally acceptable noise levels, and the increase in noise would be substantially lower at the remaining roadway segments analyzed. Therefore, Project-related noise increases, when measured against the future cumulative conditions, would be less than the applicable threshold and therefore less than significant.

**TABLE 5-24  
OFF-SITE TRAFFIC NOISE IMPACTS- COMPARISON BETWEEN EXISTING AND CUMULATIVE  
CONDITIONS**

Roadway Segment	CNEL (dBA) at Referenced Distances from Roadway Right-of-Way <sup>a</sup>		
	Existing	Cumulative	Difference
<b>Del Rey Avenue</b>			
Between Washington Blvd and Maxella Ave	72.7	73.2	0.5
n/o Washington Blvd	60.9	56.9	-4.0
<b>Glencoe Avenue</b>			
Between Washington Blvd and Maxella Ave	70.2	70.8	0.6
s/o Maxella Ave	71.0	71.6	0.6
<b>Lincoln Boulevard</b>			
Between Washington Blvd and Maxella Ave	72.1	72.4	0.3
n/o Washington Blvd	74.9	74.6	-0.3
s/o Maxella Ave	72.1	73.0	0.9
<b>Maxella Avenue</b>			
Between Del Rey Ave and Glencoe Ave	67.3	68.3	1.0
Between Lincoln Blvd and Del Rey Ave	67.8	68.8	1.0
e/o Glencoe Ave	66.0	65.6	-0.4
w/o Lincoln Blvd	68.0	65.7	-2.3
<b>Washington Boulevard</b>			
Between Del Rey Ave and Glencoe Ave	71.1	71.6	0.5
Between Lincoln Blvd and Del Rey Ave	71.3	71.8	0.5
e/o Glencoe Ave	71.7	72.9	1.2
w/o Lincoln Blvd	71.7	72.2	0.4
SOURCE: Gibson Transportation Consulting, 2022; ESA, 2022.			

**b. Generation of excessive groundborne vibration or groundborne noise levels?  
Less than Significant Impact.**

***Construction***

Construction activities can generate varying degrees of groundborne vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibration from construction activities rarely reaches levels that damage structures. The FTA provides reference peak particle velocity (PPV) levels for various types of construction equipment, as shown in **Table 5-25, Typical Vibration Velocities for Potential Project Construction Equipment.**

**TABLE 5-25  
TYPICAL VIBRATION VELOCITIES FOR THE PROJECT CONSTRUCTION EQUIPMENT**

Equipment	Approximate PPV (in/sec)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011
Loaded Trucks	0.076	0.027	0.020	0.015	0.010
Jackhammer	0.035	0.012	0.009	0.007	0.004
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004

Source: FTA, Transit Noise and Vibration Impact Assessment, September 2018; ESA, 2022.

Construction of the Project would generate groundborne construction vibration during site clearing, grading and shoring activities. Based on the vibration data provided in Table 5-25, vibration velocities from operation of construction equipment would range from approximately 0.001 to 0.031 in/sec PPV at 50 feet from the source of activity. Off-site sensitive receivers or buildings located at least 25 feet from the project construction area would be exposed to vibration levels below 0.089 in/sec PPV (highest vibration level measured at 25 feet from the equipment listed in Table 5-25 above) from onsite construction activity. Impacts would be less than significant.

***Operation***

The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. In addition, the primary sources of transient vibration

would include passenger vehicle circulation within the proposed subterranean and ground-level parking areas. Groundborne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 in/sec PPV adjacent to the Project Site.<sup>153</sup> The potential vibration levels from all Project operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.2 inch per second PPV significance threshold for potential residential building damage. As such, vibration impacts associated with operation of the Project would be below the significance threshold and impacts 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.** As discussed in response to Checklist Question IX.e above, the Project Site is not located within an airport land use plan, within two miles of a public use airport, or within the vicinity of a private airstrip. Airport and airfields in proximity to the Project Site include Los Angeles International Airport approximately 2.75 miles to the southwest, and the Santa Monica Airport approximately 1.63 miles to the west. Therefore, construction or operation of the Project would not expose people to excessive airport related noise levels. No impact would occur in this regard, and these issues are not assessed further in the report.

## **Cumulative Impacts**

### ***Construction***

As discussed previously, the Project's construction activities could temporarily increase ambient noise levels at nearby noise-sensitive land uses. However, following implementation of mitigation, such increases would be less than significant. Though the Project's construction is not anticipated to increase ambient noise levels above significance thresholds at any of the off-site sensitive receiver locations in the Project vicinity, any other developments that are built at the same time as the Project could contribute to additional increases in noise levels at these receptors and result in cumulatively considerable impacts. However, only two such related projects are located within 500 feet of these receptors at the time of this report, two mixed-use developments at 4040 Del Rey Avenue and 4065 Glencoe Avenue. The project at 4040 Del Rey Avenue is currently under construction and the project at 4065 Glencoe Avenue has been completed. The 4040 Del Rey Avenue development would most likely be fully constructed, leased, and occupied by the time that the Project's construction begins. As a result, this related project would not contribute to cumulative construction noise levels at shared sensitive receptors. In fact, this related project, as well as the 4065 Glencoe Avenue development, would instead be future sensitive receptors to the Project. The 4065 Glencoe Avenue development is located further from the Project Site than receptor

<sup>153</sup> This vibration estimate is based on data presented in the Federal Transit Administration 2018 Transit Noise and Vibration Impact Assessment Manual.

location R7 and the line-of-sight to the Project is blocked by the residential building denoted by location R7. As impacts would be less-than-significant at receptor, location R7, impacts would also be less-than-significant at the 4065 Glencoe Avenue development. Other related projects are located over 500 feet from the Project’s sensitive receptors and would contribute nominally to cumulative construction noise levels at these receptors. As discussed previously, with mitigation, the Project’s construction noise impact would be less than significant. Therefore, cumulative construction noise impacts would be less than significant.

Concerning vibration, the Project would generate minimal construction-related groundborne vibrations at the nearest surrounding structures, far below thresholds associated with building damage. As related construction projects would be located hundreds of feet from shared vibration receptors, there is no potential for cumulatively considerable vibration impacts at shared receptors. Additionally, the presence of multiple vibration sources rarely results in cumulative increases in groundborne vibration levels. In general, more vibration sources result in more vibration peaks (i.e., PPV groundborne vibration signals), not necessarily higher peaks, because the probabilities of constructive wave interference are extremely small. Therefore, cumulative construction vibration impacts would be less than significant.

**Operation**

As discussed earlier, the Project’s on-site operational noise sources, such as open space event noise and roof-mounted HVAC equipment, would have a minimal effect on surrounding ambient noise levels. Additionally, the Project’s net new trip generation would not contribute to substantial or even discernible increases in roadside noise levels. The effect of the Project’s operations on surrounding ambient noise conditions would be minimal and therefore, would not contribute meaningfully to any cumulatively considerable noise increases. As such, cumulative operational noise impacts would be less than significant.

**XIV. Population and Housing**

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less than Significant Impact.** The Project would involve the development of a residential building. According to the California DOF, the City has an estimated population of 3,819,538 with an average household size of 2.6 persons for the year 2022.<sup>154</sup> SCAG estimates that the City’s population would increase to 4,771,300 by 2045, an increase of approximately 24.9 percent or 951,762 persons.<sup>155</sup> As stated in the *Transportation Assessment* (Appendix K), the Project would include construction of 210 residential units, which would increase the existing population by up to approximately 473 residents (an approximate 0.01 percent increase from the existing population) to 3,820,011. This population increase would be within SCAG’s 2045 population forecast. In addition, according to California DOF 2022 estimates, the City has an existing housing stock of 1,562,672 units, which SCAG forecasts would increase by 230,328 units (an approximate 14.7 percent increase) to 1,793,000 units by 2045.<sup>156,157</sup> The Project would generate 210 residential units, which would represent approximately 0.09 percent of the projected increase in housing units. With regard to employment, the Project would not generate any new employees (Appendix K).

Given that the Project would not exceed SCAG’s 2045 population, housing, or employment forecast, the Project would not cause a substantial increase in population or

<sup>154</sup> California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022, <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>, accessed August 15, 2022.

<sup>155</sup> SCAG, Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographic and Growth Forecast Technical Report, Table 14, Jurisdiction-Level Growth Forecast, p. 35, September 2020, [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579), accessed August 15, 2022.

<sup>156</sup> California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022, <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>, accessed August 15, 2022.

<sup>157</sup> SCAG, Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographic and Growth Forecast Technical Report, Table 14, Jurisdiction-Level Growth Forecast, p. 35, September 2020, [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579), accessed August 15, 2022.

induce unplanned population growth. Impacts would be less than significant, and no mitigation measures would be required.

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

**No Impact.** No dwelling units are currently located on the Project Site and implementation of the Project would not result in the displacement of a substantial number of people. Since housing or people would not be displaced, the construction of replacement housing elsewhere would not be necessary. No impacts would occur, and no mitigation measures would be required.

**Cumulative Impacts**

Of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), six of the related projects include development of residential uses (a total of 873 dwelling units), two related projects include development of office uses (a total of 71,977 square feet), one related project includes development of manufacturing and retail uses (25,150 square feet of manufacturing and 5,028 square feet of retail), and one related project includes development of office and retail uses (121,822 square feet of office and 1,500 square feet of retail). The office and retail uses could create employment that can be filled from the existing workforce in the City, but office uses could provide new jobs that would attract new residents to the area. However, the more direct generator of potentially new residents is residential development.

Combined with the Project, the potential cumulative housing increase would be 1,083 units, and the potential cumulative residential population increase would be 2,743 residents.<sup>158,159</sup> As shown in **Table 5-26, Cumulative Comparison to Growth Forecasts (2020-2045)**, cumulative population and housing growth would represent less than one percent of the forecasted growth between 2020 and 2045. Thus, cumulative population and housing growth would fall within the forecasted growth for the City. Thus, cumulative development would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, cumulative impacts related to population and housing growth would be less than significant.

<sup>158</sup> California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022, <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>, accessed August 15, 2022.

<sup>159</sup> 873 residential units from the related projects x City of Los Angeles' average household size of 2.6= 2,270 residents

**TABLE 5-26  
CUMULATIVE COMPARISON TO GROWTH FORECASTS (2020-2045)**

Cumulative Population and Housing Growth	Forecast Citywide Growth (2022-2045) <sup>1</sup>	Cumulative % of Forecast Citywide Growth
2,743 residents	+951,762	0.29
1,083 units	+230,328	0.47

<sup>1</sup> Forecasted Citywide growth for population and housing is based on the change between the 2022 DOF population and housing estimates and the 2045 projections in SCAG's 2020-2045 RTP/SCS, adopted on September 3, 2020.

## XV. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### a. Fire protection?

**Less than Significant Impact.**

#### **Construction**

The LAFD provides fire protection and emergency services to the City, including the Project Site. The LAFD is responsible for enforcing City fire codes, providing fire inspections, assisting in planning, and enforcing development standards. All site and building development carried out under the Project would be required to comply with all applicable City fire codes and ordinance requirements for construction, emergency/fire, access, water mains, fire flows, and hydrants, and would be subject to review and approval by the LAFD prior to building permit and certificate of occupancy issuance.

Development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, and automatic fire sprinklers, would enhance fire safety and support fire protection services.

The 2.83-acre Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. All existing uses would be demolished and removed from the Project Site, and the Site would be developed with a six-story, 210-unit multi-family residential building. The proposed residential development would be similar to other residential developments already found in the Project area and region. As discussed in the response to Checklist Question XIV.a, the Project would add a residential population of approximately 473 people to the Project Site. It should be noted that it is possible that all or some of the 473 residents could already live in the City with an existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. For the purposes of this analysis, it is conservatively assumed that all 473 residents would be new residents to the City.

The LAFD considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between a high-density residential/commercial neighborhood land use, such as the Project, and a LAFD station that houses an engine company is 1.5 miles and a LAFD station that houses a truck company is 2 miles. If these distances are exceeded, all structures would be required to include automatic fire sprinkler systems.

The Project Site is served by LAFD Fire Station 63, a truck company, located approximately 0.8 mile northwest at 1930 Shell Avenue.<sup>160</sup> Other fire stations near the Project Site include LAFD Station 67, an engine company, located approximately 1.3 miles south at 5451 Playa Vista Drive, and LAFD Station 62, an engine company, located approximately 1.5 miles northeast at 11970 Venice Boulevard. As the Project is within 1.5 miles of an engine company and 2 miles of a truck company, the Project meets the standards outlined in LAMC Section 57.507.3.3.

The Project would be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, LAMC, and LAFD, to ensure adequate fire protection. In addition, the City requires that plans for building construction, fire flow requirements, fire protection devices (e.g. automatic sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable Los Angeles Department of Building and Safety (LADBS) and LAFD standards and requirements for design and construction. Therefore, the Project

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<sup>160</sup> Los Angeles Fire Department, Find Your Station, <https://www.lafd.org/fire-stations/station-results>, accessed August 18, 2022.

would not result in any significant impacts related to emergency access. As shown in Exhibit 2 of the Utility Technical Report, LADWP has determined that the existing 8-inch water main located approximately 37 feet from the Project Site would provide adequate fire-flow to serve the Project Site, with 3,150 gpm at a residual pressure of 20 pounds per square inch. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process, and any necessary infrastructure improvements would be completed by the Project. Through compliance with these requirements, the Project would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to fire protection services would be less than significant. No mitigation measures would be required.

### **Cumulative Impacts**

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area 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 Proposed Project, the related 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 projects located farther than specified distances from the nearest LAFD fire stations 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 Proposed Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact to fire protection services would be less than significant.

### **b. Police protection**

**Less than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Police Department's (LAPD) Pacific Community area (Reporting District 1443), which services a residential population of over 200,000 people.<sup>161</sup> The Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 1.3 miles southeast of the Project Site.

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<sup>161</sup> Los Angeles Police Department, Pacific Community Police Station, <https://www.lapdonline.org/lapd-contact/west-bureau/pacific-community-police-station/?zip=4112%20del%20rey%20avenue%20%20>, accessed August 18, 2022.

## **Construction**

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would include security measures on the Project Site as needed and appropriate during the construction process. These security measures would include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security measures would depend on the phase of construction. The Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials, including building supplies, metals, and construction equipment are not easily stolen or vandalized.

During construction, emergency response vehicles could clear or circumvent traffic by using their sirens to clear a path of travel or driving in lanes of opposing traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
2. Construction impacts would be temporary in nature and would not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, as emergency response drivers could clear or circumvent traffic by using their sirens to clear a path of travel or driving in lanes of opposing traffic. In addition, if partial closures to streets surrounding the Project Site occur, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not substantially affect the LAPD's ability to respond to emergencies such that additional new or expanded police facilities would be required. Therefore, construction impacts on police services would be less than significant. No mitigation measures would be required.

## **Operation**

The Project would include security features, such as appropriate lighting in and around the proposed residential building and controlled access to the above-ground parking structure. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security as well as lighting and landscaping design that ensures high visibility. The Project's provision of on-site security measures, coordination with LAPD, and incorporation of crime prevention features would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. In addition, the Project would contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Moreover, consistent with *City of Hayward v. Trustees of California State University (2015) 242 Cal.App.4th 833*, significant impacts under CEQA consist of

adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires an applicant to mitigate. Therefore, Project impacts related to police protection services would be less than significant. No mitigation measures would be required.

Pursuant to LAPD standards, the LAPD would determine if any additional crime prevention and security features are available that are consistent with the development standards as applied to the design of the Project. Any additional design features identified by the LAPD would be incorporated into the Project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the Project.

### **Cumulative Impacts**

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in a net increase in the number of residents and employees in the Project Site area 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 related projects would be subject to the review and oversight 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 Proposed Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered police protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact to police protection services would be less than significant.

### **c. Schools**

**Less than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). The LAUSD schools serving the Project Site include Short Avenue Elementary School located at 12814 Maxella Avenue, approximately 0.6 mile southeast of the Project Site; Marina Del Rey Middle School located at 12500 Braddock Drive, approximately 1.27 miles southeast of the Project Site; and Venice Senior High School located at 13000 Venice Boulevard, approximately 0.57-mile northeast of the Project Site. As shown below in **Table 5-27, *Estimated Project Student Generation***, the Project would generate approximately 77 additional students within the Project area. It should be noted that it is possible that all or some of the estimated Project students could already live in the City with an existing demand for school services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for school services. This analysis conservatively assumes that all estimated Project students would be new students to the

City. Pursuant to California Government Code Section 65995, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, the Project would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Project impacts to school services would be less than significant. No mitigation measures would be required.

**TABLE 5-27**  
**ESTIMATED PROJECT STUDENT GENERATION**

Land Use	Size	Student Type	Student Generation Rate <sup>a</sup>	Total Students Generated
Residential	210 du	Elementary (K-6)	0.1953/du	41
		Middle (7-8)	0.0538/du	11
		High (9-12)	0.1071/du	22
		Special Day Class	0.0148/du	3
<b>Total</b>				<b>77</b>

NOTES: du = dwelling unit

<sup>a</sup> 2022 Developer Fee Justification Study, LAUSD, March 2022.

SOURCE: ESA, 2022.

### Cumulative Impacts

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in a net increase in the number of students in the Project Site area and could further increase the demand for school services. Similar to the Applicant of the Project, the applicants of all the related projects would be required to pay the state mandated applicable school fees to LAUSD to ensure that no significant impacts to school services would occur. Thus, cumulative development would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impacts to school services would be less than significant.

#### d. Parks

**Less than Significant Impact.** The City of Los Angeles Department of Recreation and Parks currently operates and maintains over 16,000 acres of parkland with over 444 park sites within the City.<sup>162</sup> The nearest parks to the Project Site are the Yvonne B. Burke Park and Glen Alla Park, located approximately 0.3 mile west and 0.7 mile southeast, respectively, from the Project Site.

<sup>162</sup> City of Los Angeles Department of Recreation and Parks, Who We Are, <https://www.laparks.org/department/who-we-are>, accessed August 18, 2022.



The 2.83-acre Project Site is currently developed with six buildings occupied by creative office and warehouse uses and associated surface-level parking. All existing uses would be demolished and removed from the Project Site, and the Site would be developed with a six-story, 210-unit multi-family residential building. The proposed residential development would be similar to other residential developments already found in the Project area and region. As discussed in the response to Checklist Question XIV.a, the Project would add a residential population of approximately 473 people to the Project Site. It should be noted that it is possible that all or some of the 473 residents could already live in the City with an existing demand for parks and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. For the purposes of this analysis, it is conservatively assumed that all 473 residents would be new residents to the City.

As shown in **Table 5-28, Open Space Requirements**, based on LAMC open space standards, the Project would be required to include a minimum of 24,225 square feet of open space. As discussed in Chapter 2, *Project Description*, the Project would provide 33,793 square feet of open space, including a courtyard, sky deck, and private open space.

**TABLE 5-28  
OPEN SPACE REQUIREMENTS**

<b>Unit Type</b>	<b>Number of Units</b>	<b>LAMC Section 12.21 G.2 Open Space Requirement</b>	<b>Size (sf)</b>
< 3 Habitable Rooms	119	100 sf/unit	11,900
3 Habitable Rooms	72	125 sf/unit	9,000
> 3 Habitable Rooms	19	175 sf/unit	3,325
<b>Total Required</b>			<b>24,225</b>

NOTES: LAMC = Los Angeles Municipal Code; sf = square feet

SOURCE: TCA Architects, 2022.

According to Section 2.14, Recreation and Open Space, of the Los Angeles Citywide General Plan Framework Final EIR, the City's standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks and two acres per 1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks.<sup>163</sup> Therefore, implementation of the Project would require approximately 1.89 acres of parkland.<sup>164</sup> However, in accordance with Ordinance No. 184,505, the Applicant would be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for

<sup>163</sup> City of Los Angeles, Los Angeles Citywide General Plan Framework Final EIR, June 1996.

<sup>164</sup> 473 residents/1,000 x 4 = 1.89 acres.

parks and recreational facilities.<sup>165</sup> Through compliance with City requirements, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to parks and recreational services would be less than significant. No mitigation measures would be required.

### Cumulative Impacts

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in a net increase in the number of residents in the Project Site area and could further increase the demand for parks. Similar to the Proposed Project, the related projects would require the inclusion of open space and payment of park fees (or parkland dedication) to mitigate demand for parks. Thus, cumulative development would not cause the need for new or altered parks and recreational facilities, the construction of which could result in a significant impact. Therefore, the cumulative impact on parks would be less than significant.

#### e. Other public facilities?

**Less than Significant Impact.** Other public facilities that could potentially be impacted by the Project include library services. The Los Angeles Public Library (LAPL) system currently serves the City. The nearest libraries to the Project Site are the Lloyd Taber-Marina del Rey Library, located approximately 0.33 mile southwest at 4533 Admiralty Way and the Venice - Abbot Kinney Memorial Branch Library, located approximately 1.17 miles northwest at 501 South Venice Boulevard. Due to the infill nature of the Project, the population increase of approximately 473 residents may result in a significant impact on LAPL's services.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increases LAPL's responsibility for its direct and indirect costs until they are paid. The measure is intended to provide neighborhood public libraries with additional funding to help purchase books, restore library service hours, and support library programs, subject to audits, using existing funds without new taxes. Starting fiscal year 2014- 2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.<sup>166</sup>

Library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the Project, which would increase with the new development and be utilized for additional computers, books, staff, electronic media, and

<sup>165</sup> City of Los Angeles Department of Recreation and Parks, Park Fees, <https://www.laparks.org/planning/park-fees>, accessed August 18, 2022.

<sup>166</sup> Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, 2010.

other library materials. Therefore, impacts to library facilities would be less than significant. No mitigation measures would be required.

**Cumulative Impacts**

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in a net increase in the number of residents in the Project Site area and could further increase the demand for library services. However, the Project Site area is well served by several existing libraries, and cumulative development would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts related to library services would be less than significant.

**XVI. Recreation**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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?**

**Less than Significant Impact.** The nearest parks to the Project Site are the Yvonne B. Burke Park and Glen Alla Park, located approximately 0.3 mile west and 0.7 mile southeast, respectively, from the Project Site. Yvonne B. Burke Park includes a parcourse fitness circuit as well as a portion of the Marvin Braude Bike Trail. Glen Alla Park includes a large playground, dog park, basketball court, tennis courts, and paddle tennis courts. As discussed in the response to Checklist Question XIV.a, the Project would increase the existing population by up to approximately 473 residents. Due to the infill nature of the Project, the population increase of approximately 473 residents may result in the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts. The Project would include a total of approximately 24,393 square feet of common open space, including a courtyard, pool deck and spa area, sky deck, and interior amenity areas, and approximately 9,400 square feet of private open space in the form of balconies. Therefore, the Project would allow opportunity for on-site residents

to enjoy recreation and amenity facilities on the Project Site. As such, impacts to local parks would be less than significant. No mitigation measures would be required.

In accordance with Ordinance No. 184,505, the Applicant would be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project’s demand for parks and recreational facilities.<sup>167</sup> These fees are used to fund land acquisition and capital improvements. Given the available parks located near the Project Site, the dedication of land for open recreation space, and the requisite park fees, the development itself would not lead to substantial physical deterioration of existing recreational facilities. Therefore, impacts related to neighborhood and regional parks would be less than significant. No mitigation measures would be required.

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

**Less than Significant Impact.** As discussed above, the Project would include a total of approximately 24,393 square feet of common open space, including a courtyard, pool deck and spa area, sky deck, and interior amenity areas, and approximately 9,400 square feet of private open space in the form of balconies. The open space areas and amenities proposed under the Project would be within the footprint of the Project Site and would not expand into public space or affect available facilities. Therefore, impacts related to recreational facilities would be less than significant. No mitigation measures would be required.

**Cumulative Impacts**

Refer to the response to Checklist Question XV.d (Public Services – Parks).

**XVII. Transportation**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>167</sup> City of Los Angeles Department of Recreation and Parks, Park Fees, <https://www.laparks.org/planning/park-fees>, accessed August 18, 2022.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis is based on the information provided in the *Transportation Assessment for the 4112 Del Rey Avenue Residential Project, Los Angeles, California* (Transportation Assessment) prepared by Gibson Transportation Consulting, Inc. in January 2023, and contained in Appendix K of this SCEA.

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

**Less than Significant Impact.** The City aims to achieve an accessible and sustainable transportation system that meets the needs of all users. The City’s adopted transportation-related plans and policies affirm that streets should be safe and convenient for all users of the transportation system, including pedestrians, bicyclists, motorists, public transit riders, disabled persons, senior citizens, children, and movers of commercial goods. Therefore, the transportation requirements for proposed developments should be consistent with the City’s transportation goals and policies. Proposed projects should be analyzed to identify potential conflicts with adopted City plans and policies and, if there is a conflict, improvements that prioritize access for and improve the comfort of people walking, bicycling, and riding transit in order to provide safe and convenient streets for all users should be identified. Projects designed to encourage sustainable travel help to reduce VMT.

The methodology for determining a project's transportation impacts associated with conflicts with plans, programs, ordinances, or policies is defined per the City's Transportation Assessment Guidelines (TAG) as follows:<sup>168</sup>

- A project that generally conforms with and does not obstruct the City's development policies and standards will generally be considered to be consistent. The project applicant should review the documents and ordinances identified in the TAG (refer to Table 2.1-1 on page 2-3 of the TAG) for City plans, policies, programs, ordinances, and standards relevant to determining project consistency. A specific list of questions (refer to page 2-1 of the TAG) should be answered in order to help guide whether the project conflicts with City circulation system policies. A "yes" or "no" answer to these questions does not determine a conflict. Rather, the project applicant should review relevant policies and programs corresponding to the questions to assess whether the proposed project precludes the City's implementation of any adopted policy and/or program.
- If vacation of a public ROW, or relief from a required street dedication is sought as part of a proposed project, an assessment should be made as to whether the ROW in question is necessary to serve a long-term mobility need, as defined in the Mobility Plan 2035, transportation specific plan, or other planned improvement in the future.

As discussed in the Transportation Assessment prepared for the Project by Gibson Transportation Consulting, Inc. in October 2022 (refer to Appendix K), the existing half roadway width along Del Rey Avenue is approximately 18 feet (full roadway width of 36 feet) and the existing sidewalk on the east side, adjacent to the Project Site, is approximately 7 feet. No sidewalk is provided on the west side of Del Rey Avenue. The Project would require a 5-foot dedication along with sidewalk widening to meet the half-width ROW standard of 30 feet and 12-foot-wide sidewalks required under the City's Mobility Plan 2035. In addition, the Project would include a 10-foot setback along Del Rey Avenue for landscaping and pedestrian amenities.

As further detailed in the Transportation Assessment (Appendix K), the Project is generally consistent with the City's Mobility Plan 2035, Plan for a Healthy Los Angeles, Palms – Mar Vista – Del Rey Community Plan, LAMC Section 12.21.A.16 (Bicycle Parking), LAMC Section 12.26J (TDM Ordinance), Vision Zero Action Plan, Vision Zero Corridor Plans, Streetscape Plans, and Citywide Design Guidelines as the Project would promote active transportation modes by locating housing near high-frequency transit and providing secure bicycle parking and convenient pedestrian access, expand multifamily housing opportunities while preserving the local neighborhood character, and increase safety by removing five existing driveways on site. Therefore, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation measures would be required.

<sup>168</sup> Los Angeles Department of Transportation, Transportation Assessment Guidelines, August 2022, <https://ladot.lacity.org/documents/transportation-assessment>, accessed October 28, 2022.

**b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less than Significant Impact.** For land use projects, the intent of this threshold is to assess whether a land use project or plan causes substantial VMT. The City has developed impact criteria to address this question. The criteria below are based on the OPR Technical Advisory, but reflect local considerations. The impact criteria applicable to the Project is as follows:

- For residential projects, the Project would generate household VMT per capita exceeding 15 percent below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the Project is located.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. The City's significance thresholds (i.e., provided on a daily household VMT per capita basis and a daily work VMT per employee basis) for each of the seven APC boundary areas are presented in **Table 5-29, VMT Impact Criteria**. As the Project Site is located within the West Los Angeles APC, the VMT impact criteria (i.e., 15 percent below the APC average) applicable to the Project is 7.4 Daily Household VMT per Capita and 11.1 Daily Work VMT per Employee.

**TABLE 5-29  
VMT IMPACT CRITERIA**

APC	15% Below APC Criteria	
	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

SOURCE: LADOT, 2022.

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.3 of the City's VMT Calculator tool. As indicated in the Transportation Assessment, the Project is forecast to generate a total of 938 daily vehicle trips. In addition, the estimated Daily Household VMT per Capita for the Project is 6.9 Daily Household VMT per Capita, which is less than the West Los Angeles APC significance threshold of 7.4 Daily Household VMT per Capita. It is noted that the Project would incorporate TDM measures, including reduced vehicle parking supply and bicycle parking in accordance with LAMC requirements, as Project features. Therefore, based on the

above, the Project would not result in a significant VMT impact, and no mitigation measures would be required.

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

**Less than Significant Impact.** As stated in the City's TAG document (refer to Section 2.4.1 of the TAG), impacts regarding the potential increase of hazards due to a geometric design feature generally relate to the design of access points to and from the project site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle/vehicle, vehicle/bicycle, or vehicle/pedestrian conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. These conflicts may be created by the driveway configuration or through the placement of project driveway(s) in areas of inadequate visibility, adjacent to bicycle or pedestrian facilities, or too close to busy or congested intersections. Evaluation of access impacts require details relative to project land use, size, design, location of access points, etc. These impacts are typically evaluated for permanent conditions after project completion but can also be evaluated for temporary conditions during project construction. Project access can be analyzed in qualitative and/or quantitative terms, and in conjunction with the review of internal site circulation and access to parking areas. All proposed site access points should be evaluated.

The City's TAG document states that the determination of significance shall be on a case-by-case basis, considering the following factors:

- The relative amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists. The type of bicycle facilities the project driveway(s) crosses and the relative level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walks, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.
- The project location, or project-related changes to the public right-of-way, relative to proximity to the High Injury Network or a Safe Routes to School program area.
- Any other conditions, including the approximate location of incompatible uses that would substantially increase a transportation hazard.

The Project Site has frontage along Del Rey Avenue, a Local Street with a posted speed limit of 25 miles per hour. The Project would improve the pedestrian experience along this corridor, including at the Project Site access points, which would enhance connections to and from the numerous pedestrian destinations in the direct vicinity of the Project Site. As previously noted, the Project would improve the sidewalk along the Project frontage to enhance the pedestrian experience and meet the 12-foot-wide sidewalks required



under the City's Mobility Plan 2035. Additionally, the Project proposes to provide a fenced courtyard for Project residents which would include a pedestrian access point along the Project Site's Del Rey Avenue frontage. The sidewalk and driveway enhancements, as well as the courtyard along Del Rey Avenue would reduce the potential for vehicle/pedestrian conflicts at the proposed driveway. Adequate line of sight would be provided for all modes of travel (motorists, pedestrians, and bicyclists) at the Project Site driveway as it would be located on a straight, flat section of the road. The Project would remove five existing driveways along the Project Site's Del Rey Avenue frontage, which would promote a safer environment for pedestrians and bicyclists and would minimize conflict points. In addition, pedestrian and bicycle access to the Project Site would be located separately from vehicular access and thus, would reduce conflicts between pedestrians and vehicles. The Project Site and surrounding area are in good physical condition and located on flat terrain. The physical condition of the Project Site and proposed entry/exit points would be improved in conjunction with the Project and as such, the potential for vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts would be reduced. Furthermore, Del Rey Avenue is not indicated as being within the City's High Injury Network.<sup>169</sup> Given the existing physical conditions of the Project Site and planned reduction of driveways along Del Rey Avenue, no safety concerns related to geometric design are noted.

The proposed driveway would be designed to comply with LADOT standards. The driveway would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. No security gates or other parking control features are proposed along the Project Site driveway in close proximity to the public ROW. As discussed in the Transportation Assessment, no excessive vehicle queuing is anticipated at the Project Site driveway. The proposed driveway would be constructed to meet City standards to ensure adequate maneuvering by vehicles entering and exiting the Project Site. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and Project impacts related to Threshold T-3 would be less than significant. No mitigation measures would be required.

#### **d. Result in inadequate emergency access?**

**Less than Significant Impact.** All ingress/egress associated with the Project would be designed and constructed in conformance with all applicable LADBS, Bureau of Engineering (BOE), and LAFD standards and requirements for design and construction. During construction, the Project would include a Construction Traffic Management Plan (provided below as PDF-TRANS-1), which would ensure that adequate emergency access exists during construction. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new

<sup>169</sup> Los Angeles Department of Transportation, High Injury Network, 2021, [https://geohub.lacity.org/datasets/4ba1b8fa8d8946348b29261045298a88\\_0/explore?location=33.993209%2C-118.452228%2C15.74](https://geohub.lacity.org/datasets/4ba1b8fa8d8946348b29261045298a88_0/explore?location=33.993209%2C-118.452228%2C15.74), accessed October 25, 2022.

construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit.

The drivers of emergency vehicles typically have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project.

In addition, prior to issuance of a building permit, the Applicant would be required to submit parking and driveway plans to the BOE, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Therefore, the Project would not result in any significant impacts related to emergency access. No mitigation measures would be required.

### ***Project Design Feature***

**PDF TRANS-1:** Prior to the start of construction, the Project Applicant shall prepare a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and staging plans, and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The CTMP and Worksite Traffic Control Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Minimize obstruction of traffic lanes adjacent to the Project Site to the extent feasible;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized offsite staging area;
- Provide advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibit construction worker or equipment parking on adjacent streets;
- Provide temporary pedestrian, bicycle, and vehicular traffic controls to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways;

- Schedule construction activities to reduce the effect on traffic flow on surrounding arterial streets to the extent feasible;
- Contain construction activity within the Project Site boundaries;
- Implement safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic detours and control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Schedule construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible; and/or
- Prepare a haul truck route program that specifies the construction truck routes to and from the Project Site.

## **Cumulative Impacts**

### ***Threshold T-1***

Per the City's TAG, the analysis of cumulative consistency requires consultation and confirmation with LADOT and the City's Department of City Planning (LADCP). As with the Project, the related projects will include adequate bicycle facilities and include high-density urban uses in proximity to the nearby multimodal transportation facilities.

Furthermore, the project at 4040 Del Rey Avenue, located approximately 615 feet west of the Project Site along Del Rey Avenue is under construction and will be completed prior to the construction and occupancy of the Project. The related projects, as with the Project, would not conflict with adjacent street designations and classifications. No street widenings would be necessary for these projects. Accordingly, there would be no significant cumulative impacts to which the Project, as well as other nearby related projects, would contribute to regarding transportation policies or standards adopted to protect the environment and support multimodal transportation options and a reduction in VMT. Based on the discussion and conclusion above for the Project, the guiding language contained in the City's TAG, and review of related projects in the Project Site vicinity, this documentation is sufficient to demonstrate that there is also no cumulative inconsistency with the City's plans, policies, ordinances and programs and therefore, the cumulative impacts of the Project in concert with the related projects would be less than significant.

### ***Threshold T-2.1***

As stated in the City's TAG (refer to Section 2.2.4 thereof), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the

detailed Project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with SCAG’s RTP/SCS. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG emissions reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City’s TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less-than-significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City’s efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG’s RTP/SCS. Based on the above Project-related VMT analysis and the conclusions reported in Section 4B of the Transportation Assessment (i.e., which conclude that the Project falls under the City’s efficiency-based impact thresholds and thus is already shown to align with the long-term VMT and GHG reduction goals of SCAG’s RTP/SCS), the Project’s cumulative VMT impact would be less than significant.

## XVIII. Tribal Cultural Resources

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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. 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
 

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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 with Mitigation Incorporated.** As stated in the *Cultural Resources Assessment Report* prepared for the Project (refer to Appendix C-2), AB 52, which requires lead agencies to consult with tribes about potential project impacts and tribal cultural resources in the project area, applies specifically to projects for which a Notice of Preparation of an Environmental Impact Report (EIR) or a Notice of Intent to Adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. Environmental review for the Proposed Project is not expected to require preparation of an EIR, ND or MND; therefore, notification and government-to-government consultation pursuant to AB 52 and its implementing regulations have not been conducted.

The NAHC was contacted on July 15, 2022, to request a search of the SLF to determine if the Project Site is within the boundaries of any known sacred lands and/or whether any tribal cultural resources are known to exist on the Project Site. The NAHC responded to the request in a letter dated August 29, 2022 indicating that the results were positive and to contact the Gabrielino Tongva Indians of California Tribal Council. Notwithstanding that AB 52 consultation is not normally performed in connection with the preparation of SCEAs, the City has conducted consultation with this tribe per the recommendations of the NAHC.

Construction activities are anticipated to result in a maximum excavation depth of 7 feet bgs. Implementation of Mitigation Measures MM TCR-1 would reduce potential impacts related to tribal cultural resources to a less-than-significant level.

## **Mitigation Measures**

**MM TCR-1:** Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain qualified tribal monitors/consultants from the Gabrielino Tongva Indians of California Tribal Council. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, pavement removal, grubbing, tree removals, boring or a similar activity at the project site.

The tribal monitors/consultants shall observe all ground disturbance activities on the project site at all times any ground disturbance activities are taking place that could have an impact on tribal cultural resources. The on-site monitoring shall end when the ground disturbing activities are completed, or the frequency of monitoring can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist in consultation with the Tribe and the City.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the archaeologist, in consultation with the tribal monitor/consultant approved by the Gabrielino Tongva Indians of California Tribal Council, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities in the immediate vicinity of the find until the find can be assessed by the archaeologist and tribal monitor/consultant.
2. If the archaeologist and tribal monitor/consultant determine the resources are Native American in origin, the Tribe shall coordinate with the City regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes.
3. The Applicant, or its successor, shall implement the tribe's recommendations if the archaeologist, in consultation with the tribal monitor/consultant, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe, the archaeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation. Any discrepancies between the implementation of the recommendations shall be resolved through

- the City as the Lead Agency, in consultation with the archaeologist and tribal monitor/consultant.
5. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the archaeologist and tribal monitor/consultant and determined to be reasonable and appropriate.
  6. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 4 above.
  7. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
  8. Notwithstanding paragraph 7 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.
  9. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

**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.**

**Less than Significant with Mitigation Incorporated.** Refer to response to Checklist Question XVIII.a above.

### **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 related 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 Mitigation Measures MM TCR-1 as well as existing regulations, Project impacts associated with tribal cultural 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 related projects. As such, the Proposed Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to tribal cultural resources would be less than significant.

## XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



The analysis is based on the information provided in the *4112-4136 Del Rey Avenue Utility Technical Report* (Utility Technical Report) prepared by David Evans and Associates Inc. in August 2022, and contained in Appendix L of this SCEA.

**a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less than Significant Impact.** As discussed below, Project impacts related to these issues would be less than significant.

***Water Facilities***

Domestic water service to the Project Site is provided by LADWP. An 8-inch water main located approximately 37 feet from the Project Site on the west side of Del Rey Avenue. During construction of the Project, water would be required for activities including dust control, cleaning of equipment, excavation/export, and removal and recompaction. Based on a review of a construction project of similar size and duration in the Utility Technical Report, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). As construction water use would be temporary and less than the existing water consumption at the Project Site, it is anticipated that the existing water infrastructure would meet the limited water demand associated with construction of the Project. The Project would also require the construction of new, on-site water distribution lines that would connect to the existing 8-inch water main to serve the Project's proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connection to the public main, if required. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, construction impacts related to water facilities would be less than significant.

As shown in **Table 5-30, *Estimated Project Water Consumption and Wastewater Generation***, the Project operation would consume approximately 17,557 gpd (or 0.02 mgd) of water and discharge an equivalent amount of wastewater. It should be noted that this amount accounts for the net reduction in water demand/wastewater generation associated with existing uses that would be removed from the Project Site but does not account for the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table 5-30.

**TABLE 5-30**  
**ESTIMATED PROJECT WATER CONSUMPTION AND WASTEWATER GENERATION**

<b>Proposed Use</b>	<b>Amount</b>	<b>Rate<sup>a,b</sup></b>	<b>Total (gpd)</b>
<b>Existing</b>			
Office/Warehouse	64,880 sf	120/1,000 sf	7,788
<i>Total Existing</i>			<i>7,788</i>
<b>Project</b>			
Residential: Apt - Bachelor	33 du	75/du	2,475
Residential: Apt - 1 Bedroom	108 du	110/du	11,880
Residential: Apt - 2 Bedroom	53 du	150/du	7,950
Residential: Apt - 3 Bedroom	16 du	190/du	3,040
<b>Total Proposed</b>			<b>25,345</b>
(Less Existing)			(7,788)
<b>Net Total</b>			<b>17,557</b>

NOTES: gpd = gallons per day; gr sf = gross square feet; du = dwelling unit  
Assumes wastewater generation is equivalent to water consumption.

<sup>a</sup> City of Los Angeles Bureau of Sanitation, *Sewer Generation Factors*, April 6, 2012.

<sup>b</sup> The Office sewage generation rate of 120/1,000 square feet was used to approximate the existing water consumption and wastewater generation of the existing creative office and warehouse uses on site and is more conservative than the Warehouse sewage generate rate of 30/1,000 square feet.

SOURCE: ESA, 2022.

For these reasons, 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. Furthermore, based on the results from LADWP's Service Advisory Report and Information of Fire Flow Availability Request, adequate water infrastructure capacity exists for both fire suppression and domestic water demands generated by the Project.<sup>170</sup> Therefore, Project impacts related to water facilities would be less than significant, and no mitigation measures would be required.

### Cumulative Impacts

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in an increased cumulative on water conveyance infrastructure. **Table 5-31, *Estimated Cumulative Water Consumption and Wastewater Generation***, shows that the cumulative development would consume approximately 193,985 gallons of water per day (or 0.19 mgd per day). As with the Project, the applicants of the related projects would be subject to review by their respective water agencies to ensure that existing infrastructure would be adequate to meet the water demand requirements for

<sup>170</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

each project. All development would be subject to standard requirements regarding potential infrastructure improvements to meet respective water infrastructure needs. Additionally, all development would be required to comply with Fire Code requirements for fire flow and other fire protection requirements, and would be subject to ongoing evaluations 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.

**TABLE 5-31**  
**ESTIMATED CUMULATIVE WATER CONSUMPTION AND WASTEWATER GENERATION**

<b>Proposed Use</b>	<b>Amount</b>	<b>Rate<sup>a</sup></b>	<b>Total (gpd)</b>
Residential	1,083 du <sup>b</sup>	110/du	119,130
Office	222,005 sf	120/1,000 sf	26,641
Warehouse	100,000 sf	30/1,000 sf	3,000
Commercial	4,040 sf	50/1,000 sf	202
Manufacturing	25,150 sf	50/1,000 sf	1,258
Retail	99,933 sf	50/1,000 sf	4,997
Medical Office	40,000 sf	250/1,000 sf	10,000
Hospital	160 beds	70/bed	11,200
		<b>Subtotal</b>	<b>176,428</b>
		<i>Plus Project</i>	17,557
		<b>Total</b>	<b>193,985</b>

NOTES: gpd = gallons per day; gr sf = gross square feet; du = dwelling unit  
Assumes wastewater generation is equivalent to water consumption.

<sup>a</sup> City of Los Angeles Bureau of Sanitation, *Sewer Generation Factors*, April 6, 2012.

<sup>b</sup> Conservatively assumes all units in related projects are 2-bedroom units.

SOURCE: ESA, 2022.

### **Wastewater Treatment**

Sanitary sewer service to the Project Site from the surrounding streets is provided by the City's Bureau of Sanitation (BOS). There is an existing 10-inch sewer line within Del Rey Avenue which flows northerly as well as eight sewer wyes on Del Rey Avenue fronting the Project Site.<sup>171</sup>

Construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. The Project would require construction of new on-site infrastructure to serve the new residential building.

<sup>171</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

Construction impacts associated with wastewater infrastructure would be temporary in nature and would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main, if required. No upgrades to the public main would be anticipated. Therefore, construction impacts related to wastewater treatment would be less than significant.

As shown above in Table 5-31, the Project would generate a net increase of approximately 17,557 gpd (or 0.02 mgd). A Sewer Capacity Availability Request (SCAR) was submitted to the BOE in July 2022. The SCAR found that the existing 10-inch sewer line in Del Rey Ave had adequate capacity for all sewage flow generated by the Project.<sup>172</sup>

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd to and peak wet weather flows of 800 mgd.<sup>173</sup> Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 260 mgd.<sup>174</sup> Therefore, there is approximately 190 mgd available capacity (based on dry weather flows). The Project would generate a net increase of approximately 17,557 gpd (or 0.02 mgd) (refer to Table 5-31), representing approximately 0.01 percent of the remaining wastewater treatment capacity. It should be noted that this amount accounts for the net reduction in wastewater generation associated with existing uses that would be removed from the Project Site but does not account for the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table 5-31. With a remaining daily capacity of 190 mgd, the HTP would have adequate capacity to serve the Project. Therefore, operational impacts related to wastewater treatment facilities would be less than significant, and no mitigation measures would be required.

### Cumulative Impacts

Implementation of the 11 related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K), in concert with the Project, could result in an increase the need for wastewater treatment. Table 5-31 shows that the cumulative development in the Project Site area could result in the need

<sup>172</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

<sup>173</sup> City of Los Angeles Bureau of Sanitation, Treatment Process, [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-cw-p-hwrp-tp?\\_adf.ctrl-state=q99av313h\\_376&\\_afLoop=15351161093904114#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=q99av313h_376&_afLoop=15351161093904114#!), accessed September 20, 2022.

<sup>174</sup> City of Los Angeles Bureau of Sanitation, Sewer System Management Plan, January 25, 2019, [https://lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw-s/s-lsh-wwd-cw-s-s-smp?\\_afLoop=15351334644306934&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=six2n73v6\\_1#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D15351334644306934%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dsix2n73v6\\_5](https://lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw-s/s-lsh-wwd-cw-s-s-smp?_afLoop=15351334644306934&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=six2n73v6_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D15351334644306934%26_afWindowMode%3D0%26_adf.ctrl-state%3Dsix2n73v6_5), accessed September 20, 2022.

to treat approximately 193,985 gallons of water per day (or 0.19 mgd per day), representing approximately 0.1 percent of the remaining wastewater treatment capacity. It should be noted that this amount does not take into account the net decrease in 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 shown in Table 5-31. With a remaining treatment capacity of approximately 190 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 impacts would be less than significant.

### **Stormwater Drainage**

The Project Site is located within the Ballona Creek and other Urban Watersheds<sup>175</sup> in a developed area of the City served by LASAN. Therefore, the Project would be subject to the policies of the Watershed Protection Program, which employs a multi-pronged approach to ensure that the City is in compliance with regulations, including the LID Ordinance, and to reduce the amount of pollution flowing into and through regional waterways.<sup>176</sup> The primary purpose of the LID Ordinance is to ensure development projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As detailed in the response to Checklist Question X.a, to meet the City's LID and stormwater quality requirements, Permavoid devices and trench drains/area drains would be installed to mitigate low flow and treatment for the required LID volumes.<sup>177</sup> Therefore, impacts related to stormwater drainage facilities would be less than significant, and no mitigation measures would be required.

### **Cumulative Impacts**

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

### **Electrical Power**

LADWP is responsible for providing power supply to the City. LADWP's Power system serves a 465-square-mile area in the City and supplies more than 26 million megawatt-hours (MWh) of electricity a year for the City's 1.5 million residential and business customers. LADWP's distribution network includes approximately 6,800 miles of

<sup>175</sup> City of Los Angeles, Watersheds, August 27, 2020, <https://geohub.lacity.org/datasets/watersheds/explore?location=33.987078%2C-118.443332%2C16.96>, accessed September 20, 2022.

<sup>176</sup> City of Los Angeles LA Sanitation, Watershed Protection, 2022, [https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp?\\_afLoop=15352927860672268&\\_afWindowMode=0&\\_afWindowId=null&\\_adf.ctrl-state=q99av313h\\_759#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D15352927860672268%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dq99av313h\\_763](https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-wp?_afLoop=15352927860672268&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=q99av313h_759#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D15352927860672268%26_afWindowMode%3D0%26_adf.ctrl-state%3Dq99av313h_763), accessed September 20, 2022.

<sup>177</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

overhead distribution lines and 3,597 miles of underground distribution cables. In the Project vicinity, LADWP aboveground power lines are located within the Del Rey Avenue ROW.

Electrical power would be consumed during construction of the Project, including temporary power for lighting, equipment operation, and construction trailers. The demand would be supplied from existing electrical services within the Project Site and would not affect other services. Project demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies and infrastructure.

Construction impacts associated with the Project's electrical infrastructure upgrades would primarily be confined to trenching. Infrastructure improvements would comply with all applicable requirements and regulations, which would ensure that there is no substantial adverse impact to the systems or adjacent properties.

The Project could increase the demand for electricity resources at the Project Site. As discussed in the response to Checklist Question VI.a, electricity demand during Project construction would be approximately 0.57 percent of the Project's net annual operational electricity consumption and 0.0001 percent of the estimated annual sales of LADWP, which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.<sup>178, 179</sup> LADWP has provided a will serve letter indicating that electrical power services are available and can serve the Project.<sup>180</sup> Therefore, impacts related to electrical power facilities would be less than significant, and no mitigation measures would be required.

### **Cumulative Impacts**

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

### **Natural Gas**

SoCalGas is responsible for providing natural gas supply to the City. SoCalGas' natural gas system serves a 20,000 square-mile area in Central and Southern California. The system supplies natural gas to 21.6 million customers through 5.9 million meters in more than 500 communities. Within the Project vicinity, there are several SoCalGas mains including an 8.6-inch gas main and an abandoned 3-inch gas main in Del Rey Avenue.

<sup>178</sup> The percentage is derived by taking the annual average amount of electricity usage during the Project construction (14,622 kWh) and dividing that number by the annual amount of total electricity usage during Project operation (2,578,529 kWh) to arrive at 0.57 percent.

<sup>179</sup> Los Angeles Department of Water and Power (LADWP), 2017 Final Power Integrated Resource Plan, Appendix A, 2017. Available at: [https://www.ladwp.com/cs/idcplg?IdcService=GET\\_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased](https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB655007&RevisionSelectionMethod=LatestReleased), accessed October 28, 2022.

<sup>180</sup> Will Serve Letter received from Marco Maldonado on July 22, 2022. Included in Appendix L of this SCEA.

No natural gas usage would be expected to occur during construction as construction equipment and trailers typically do not use natural gas. Construction impacts associated with the Project's gas infrastructure upgrades would primarily be confined to trenching. Infrastructure improvements would comply with all applicable requirements and regulations, which would ensure that there is no substantial adverse impact to the systems or adjacent properties. In addition, as discussed in response to Checklist Question VI.a, the Project would result in a net decrease of approximately 399,285 cf of natural gas per year.<sup>181</sup> This analysis assumes that the Project would not be allowed to use natural gas for domestic and pool water heating. However, if the Project is allowed to use natural gas for domestic and pool water heating, the natural gas usage would be 6,000,000 BTUs per hours with a medium pressure service.<sup>182</sup> SoCalGas expects overall natural gas demand to decline through 2035, even accounting for population and economic growth, with efficiency improvements and the State's transition away from fossil fuel-generated electricity to increased renewable energy. The 2020 California Gas Report states, "SoCalGas projects total gas demand to decline at an annual rate of 1 percent from 2020 to 2035. The decline in throughput demand is due to modest economic growth, and CPUC-mandated energy efficiency standards and programs and SB 350 Goals. Other factors that contribute to the downward trend are tighter standards created by the revised Title 24 Codes and Standards, renewable electricity goals, a decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI)." Based on the Project's small fraction of total natural gas consumption for the region, ongoing SoCalGas long-range planning efforts to provide natural gas for this service region, and sufficient existing infrastructure, it is expected that SoCalGas' existing and planned natural gas supplies and infrastructure would be sufficient to meet the Project's demand for natural gas. If the Project is not allowed to do so, natural gas use would decrease as pool and domestic water heating would be produced by solar with heat pump back up.<sup>183</sup> SoCalGas has provided a will serve letter indicating that natural gas services are available and can serve the Project.<sup>184</sup> Therefore, impacts related to natural gas facilities would be less than significant, and no mitigation measures would be required.

### **Cumulative Impacts**

Refer to the cumulative impact discussion provided in response to Checklist Topic VI (Energy).

<sup>181</sup> As per PDF GHG-1 and PDF GHG-2, the Project would eliminate all on-site combustion of natural gas by not including fireplaces in the residential units and not including natural gas infrastructure in the buildings, which would be all electric-powered.

<sup>182</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

<sup>183</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

<sup>184</sup> Will Serve Letter received from Jason Sum on July 26, 2022. Included in Appendix L of this SCEA.

## Telecommunications

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 would be served by the existing telecommunications facilities available in the surrounding area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities but would not require new or expanded facilities. Therefore, impacts related to telecommunications facilities would be less than significant, and no mitigation measures would be required.

## Cumulative Impacts

All of the related projects listed in Table 3 on page 30 of the *Transportation Assessment* prepared for the Project (refer to Appendix K) are located in a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related 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?**

LADWP provides water service to the Project Site. LADWP's water supply sources include the Los Angeles Aqueduct, local groundwater, the State Water Project (supplied by the Metropolitan Water District [MWD]), the Colorado River Aqueduct (also supplied by MWD), and recycled water.<sup>185</sup>

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area.

The LADWP's 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including population growth, weather, water conservation, drought, and economically activity. **Table 5-32, Service Area Reliability Assessment (AFY)**, provides LADWP's projected water demand from 2025 to 2045 for average year, single dry year, and multiple dry year

<sup>185</sup> LADWP, 2020 Urban Water Management Plan for the Los Angeles Department of Water and Power, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln.jsessionid=kNcGjqHJpvryV8J8FjWn3yGgm4dTL LJRqDQV1vP3fJ9kTmzH2bTq!-603815720?\\_afLoop=218337497712450&\\_afrWindowMode=0&\\_afrWindowId=null#%40%3F\\_afrWindowId%3Dnull%26\\_afrLoop%3D218337497712450%26\\_afrWindowMode%3D0%26\\_adf.ctrl-state%3D1ac3b9i6ah\\_4](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln.jsessionid=kNcGjqHJpvryV8J8FjWn3yGgm4dTL LJRqDQV1vP3fJ9kTmzH2bTq!-603815720?_afLoop=218337497712450&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D218337497712450%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1ac3b9i6ah_4), accessed September 20, 2022.



hydrological conditions. Demographic projections for the LADWP service area are based on SCAG's demographic growth forecast for the 2020 RTP. LADWP's service area population is expected to continue to grow over the next 25 years at a rate of 0.7 percent annually.<sup>186</sup>

**TABLE 5-32**  
**SERVICE AREA RELIABILITY ASSESSMENT (AFY)**

Hydrological Conditions	Years				
	2025	2030	2035	2040	2045
Average Year	642,600	660,200	678,800	697,800	710,500
Single Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year (Year 1)	657,900	675,800	694,900	714,400	727,400
Multi-Dry Year (Year 2)	661,700	679,700	698,900	718,500	731,500
Multi-Dry Year (Year 3)	674,800	693,200	712,800	732,700	746,000
Multi-Dry Year (Year 4)	661,600	679,600	698,900	718,400	731,500
Multi-Dry Year (Year 5)	655,700	673,600	692,600	712,000	724,900

NOTE: AFY = acre-feet per year

SOURCE: LADWP, 2020 (refer to Exhibits 11E, 11F, and 11G).

As discussed in the response to Checklist Question XIV.a, Project development would not exceed the growth assumptions of Connect SoCal 2020. Based on LADWP's 2020 UWMP, LADWP has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry year and multiple dry-year hydrologic conditions.

As discussed in the response to Checklist Question XIX.a above, the Project would connect to the existing 8-inch water main on the west side of Del Rey Avenue. As shown in Table 5-32, the Project would consume an increase of approximately 17,557 gallons of water per day. Based on the results from LADWP's Service Advisory Report and Information of Fire Flow Availability Request, adequate water infrastructure capacity exists for both fire suppression and domestic water demands generated by the Project.<sup>187</sup> As such, sufficient water supplies would be available to serve the Project and reasonably

<sup>186</sup> LADWP, 2020 Urban Water Management Plan for the Los Angeles Department of Water and Power, p. 1-5, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpIn;jsessionid=kNcGjqHJpvryV8J8FjWn3yGgm4dTLLJRqDQV1vP3fJ9kTmzH2bTq!-603815720?\\_afLoop=218337497712450&\\_afWindowMode=0&\\_afWindowId=null#%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D218337497712450%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D1ac3b9i6ah\\_4](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpIn;jsessionid=kNcGjqHJpvryV8J8FjWn3yGgm4dTLLJRqDQV1vP3fJ9kTmzH2bTq!-603815720?_afLoop=218337497712450&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D218337497712450%26_afWindowMode%3D0%26_adf.ctrl-state%3D1ac3b9i6ah_4), accessed September 20, 2022.

<sup>187</sup> David Evans and Associates Inc., 4112-4136 Del Rey Avenue Utility Technical Report, August 2022. Refer to Appendix L of this SCEA.

foreseeable future development during normal, dry and multiple dry years. Therefore, impacts would be less than significant, and no mitigation measures would be required.

### **Cumulative Impacts**

Table 5-31 shows that the cumulative development would consume approximately 193,985 gallons of water per day (or 0.19 mgd per day). The 11 related projects fall under LADWP's 2020 UWMP, which anticipates meeting projected water supplies through the year 2045, through conservation measures and strategies for drought years. Similar to the Project, each related project would be required to comply with their respective conservation programs for both water supply and infrastructure. 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?**

**Less than Significant Impact.** Refer to the response to Checklist Question XIX.a above. With a remaining daily capacity of 190 mgd, the HTP would have adequate capacity to serve the Project's projected 0.02 mgd generation. In addition, the Project does not propose any changes to the zoning or land use designation for the Project Site, and therefore, wastewater generation for the Project was accounted for within City and regional estimates. Impacts related to wastewater treatment capacity would be less than significant, and no mitigation measures would be required.

### **Cumulative Impacts**

Refer to the cumulative impacts discussion included in response to Checklist Question XIX.a (Utilities and Service Systems – Wastewater Treatment).

#### **d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less than Significant Impact.** Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the CoIWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent CoIWMP (the 2020 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.<sup>188</sup> The landfills that serve the City and the capacity of these landfills are shown below in **Table 5-33, Landfill Capacity**. As shown, the landfills have an approximate available daily intake of 16,531 tons. As shown in **Table 5-34, Estimated Project Solid Waste Generation**, it is estimated that the Project would generate a net increase of approximately 0.23 tons of solid waste

<sup>188</sup> County of Los Angeles Department of Public Works, Los Angeles Countywide Integrated Waste Management Plan (CoIWMP) 2020 Annual Report, October 2021, p. 46, <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed October 27, 2022.

per day. This total is conservative and does not account for the reduction in solid waste associated with the effectiveness of recycling efforts, which the Project would be required by the City to implement. With a remaining daily intake capacity of approximately 16,531 tons of solid waste per day, the landfills serving the City could accommodate the Project's approximate net increase of 0.23 tons of solid waste per day.

The Project's solid waste would be handled by private waste collection services. Pursuant to LAMC Section 66.32.1, the Project's solid waste contractor would be required to obtain, in addition to all other required permits, an AB 939 Compliance Permit from the Los Angeles Bureau of Sanitation. The Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. In addition, the Project would be required to comply with CALGreen waste reduction measures during operation. Recycling bins would be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material and would be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. Therefore, the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, and would not otherwise impair the attainment of solid waste reduction goals. Impacts related to solid waste would be less than significant. No mitigation measures would be required.

**TABLE 5-33  
LANDFILL CAPACITY**

<b>Landfill Facility</b>	<b>Estimated Remaining Life (years)</b>	<b>Estimated Remaining Disposal Capacity (million tons)</b>	<b>Permitted Intake (tons/day)</b>	<b>Daily Disposal (tons/day)</b>	<b>Available Daily Intake (tons/day)</b>
Sunshine Canyon	17	54.1	12,100	7,420	4,680
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Antelope Valley	13	10.2	3,600	2,785	815
Lancaster	81	9.9	3,000	395	2,605
Calabasas	14	4.0	3,500	955	2,545
<b>Total</b>					<b>16,531</b>

SOURCE: Los Angeles County, *Countywide Integrated Waste Management Plan, 2020 Annual Report*, October 2021.

**TABLE 5-34  
ESTIMATED PROJECT SOLID WASTE GENERATION**

<b>Proposed Use</b>	<b>Amount</b>	<b>Rate<sup>a</sup></b>	<b>Total (tpd)</b>
<b>Existing</b>			
Office/Warehouse	64,880 sf	0.006 lbs/sf/day	0.19
<b>Total Existing</b>			<b>0.19</b>
<b>Project</b>			
Residential	210 du	4.0 lbs/du/day	0.42
<b>Total Proposed</b>			<b>0.42</b>
(Less Existing)			(0.19)
<b>Net Total</b>			<b>0.23</b>

NOTES: tpd = tons per day; lbs = pounds; du = dwelling unit; sf = square feet

<sup>a</sup> SOURCE: California Department of Resources Recycling and Recovery, "Estimated Solid Waste Generation Rates," 2019.

SOURCE: ESA, 2022.

### **Cumulative Impacts**

As shown in **Table 5-35**, *Estimated Cumulative Solid Waste Generation*, implementation of the Project in conjunction with the related projects in the Project Site area would result in an estimated solid waste generation of approximately 7.71 tons per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removal of existing uses or the effectiveness of recycling measures required in accordance with existing City's recycling regulations, both of which would likely substantially reduce the cumulative solid waste generation shown on **Table 5-35**.

**TABLE 5-35  
ESTIMATED CUMULATIVE SOLID WASTE GENERATION**

<b>Proposed Use</b>	<b>Amount</b>	<b>Rate<sup>a</sup></b>	<b>Total (tpd)</b>
Residential	1,083 du	4.0 lbs/du/day	2.17
Office/Medical Office	262,005 sf	0.006 lbs/sf/day	0.79
Warehouse	100,000 sf	0.006 lbs/sf/day	0.30
Commercial	4,040 sf	5.0 lbs/1,000 sf/day	2.02
Manufacturing	25,150 sf	62.5 lbs/1,000 sf/day	0.79
Retail	99,933 sf	2.5 lbs/1,000 sf/day	0.13
Hospital	160 beds	16.0 lbs/bed/day	1.28
		<b>Subtotal</b>	<b>7.48</b>
		<i>Plus Project</i>	0.23
		<b>Total</b>	<b>7.71</b>

NOTES: tpd = tons per day; lbs = pounds; du = dwelling unit; sf = square feet

<sup>a</sup> SOURCE: California Department of Resources Recycling and Recovery, "Estimated Solid Waste Generation Rates," 2019.

SOURCE: ESA, 2022.

With a remaining daily capacity of approximately 16,531 tons of solid waste per day, the landfills serving the Project and related project would have adequate capacity to accommodate cumulative solid waste generation. Additionally, all development in the City is required to comply with City and State recycling regulations. Therefore, cumulative impacts related to solid waste generation would be less than significant.

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

**Less than Significant Impact.** Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. In addition to AB 939, SB 1374 requires that the Project implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. The Project would comply with the applicable regulations associated with solid waste, including AB 939 and SB 1374. Therefore, impacts related to compliance with solid waste regulations would be less than significant. No mitigation measures would be required.

### Cumulative Impacts

Refer to the cumulative impact analysis under response to Checklist Question XIX.d (Solid Waste Facilities and Regulations).

## XX. Wildfire

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less than Significant Impact.** The Project Site is located in a highly urbanized and built out commercial and residential area surrounded by existing roadways and other urban infrastructure. The Project Site is not located within or near the vicinity of a Very High FHSZ.<sup>189</sup> The Project would not result in any permanent alterations to vehicular circulation routes or obstruct public access along adjacent roadways. All construction

<sup>189</sup> California Department of Forestry and Fire Protection, Fire Hazard Severity Zone Viewer, <https://egis.fire.ca.gov/FHSZ/>, accessed August 16, 2022.

staging would occur within the boundaries of the Project Site and would not interfere with circulation along the adjacent roadways, or any other nearby roadways. Although temporary lane closures may be required for utility and sidewalk improvements in the public ROW, the Applicant would be required to obtain encroachment permits from the City's Public Works Department pursuant to LAMC Section 91.3201 in Division 32, Encroachments into the Public Right-of-Way, which would ensure that appropriate access/circulation would be provided within the Project area during Project construction. In addition, the Project's Site access and internal circulation would be reviewed by BOE and the LAFD to ensure emergency access requirements are met. Therefore, impacts related to impairment or physical interference with adopted emergency plans would be less than significant. No mitigation measures would be required.

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

**Less than Significant Impact.** As discussed above in the response to Checklist Question XX.a, the Project Site is not located within or near the vicinity of a Very High FHSZ. The Project Site is leveled due to urban infrastructure and development, and does not have wildlands or natural habitat that could exacerbate an ongoing fire. Future planned vegetation and trees within the Project Site would be irrigated, and water features would be available within the Project Site which would reduce overall fire hazard. In addition, the Project, consistent with existing City Fire Code and other fire safety requirements, would include smoke/fire alarms, sprinkler systems, and irrigated landscaped areas, which would serve to reduce potential fire hazards on the Project Site. Due to the urbanized nature of the surrounding development and implementation of applicable LAMC provisions and other LAFD recommendations during the design process, the Project would not expose people or structures to a significant risk involving wildland fires. Therefore, impacts related to pollutant concentration exposure would be less than significant. No mitigation measures would be required.

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

**Less Than Significant Impact.** The Project is located in an urban area surrounded by existing infrastructure, including roadways. The Project would not include 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 significant impacts to the environment. As discussed above in the response to Checklist Question XX.b, the Project Site is not located within or near the vicinity of a Very High FHSZ and does not have wildlands or natural habitat that could exacerbate an ongoing fire. Project development would not exacerbate fire risks within the Project Site or surrounding area. Therefore, impacts related to infrastructure that

exacerbates wildfire risk would be less than significant. No mitigation measures would be required.

**d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**Less Than Significant Impact.** As discussed under Section X, Hydrology and Water Quality, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter the Project Site drainage patterns. Furthermore, there are no wildlands on the Project Site, which would preclude the possibility for significant post-wildland fire slope instability or drainage changes. No hillside areas or steep slopes occur within the Project Site or vicinity. Based on the above, Project development would not 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. Therefore, impacts related to post fire slope or drainage would be less than significant. No mitigation measures would be required.

**Cumulative Impacts**

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high FHSZ. Therefore, no cumulative impacts related to this issue would occur.

**XXI. Mandatory Findings of Significance**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Less than Significant with Mitigation Incorporated.** As discussed in the response to Checklist Question IV.f, the Project is in an urbanized area that is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.<sup>190</sup> No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. Additionally, no trees are currently present on site.<sup>191</sup>

In addition, the Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in the response to Checklist Question V.a, there are no historical resources on the Project Site, and no historical resources would be demolished, altered, or relocated as a result of the Project.

As discussed in the response to Checklist Question VII.f, while it is not likely that excavation for the Project would impact paleontological resources, it is possible that deep excavation could result in the inadvertent discovery of paleontological resources and could result in a potentially significant impact to paleontological resources. Through the implementation of MM GEO-1 and MM GEO-2, the Project would retain a qualified

<sup>190</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019, <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>, accessed on September 8, 2022.

<sup>191</sup> Carlburg Associates, 4112 Del Rey Avenue, Marina Del Rey, California 90292 – City of Los Angeles Tree Report, September 21, 2022. Refer to Appendix B of this SCEA.

paleontologist, provide paleontological resources sensitivity training, and establish inadvertent discovery protocols to reduce impacts to less-than-significant levels.

The Project would not degrade the quality of the environment, reduce, or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant with mitigation.

**b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Less than Significant with Mitigation Incorporated.** A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As discussed in Sections I, Aesthetics, through XXI, Wildfire, above, the Project would not result in any significant and unavoidable Project-specific or cumulative impacts with implementation of Project-specific mitigation measures. Therefore, impacts from the Project would be less than significant with mitigation.

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

**Less than Significant with Mitigation Incorporated.** For the purpose of this SCEA, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As discussed above, with adherence to applicable regulations and Project-specific mitigation measures, Project-related impacts would be reduced to a less than significant level. The analysis contained in this SCEA concludes that the Project would not result in significant adverse effects after implementation of mitigation measures.

Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures identified in Sections I, Aesthetics, through XXI, Wildfire, above. Therefore, impacts from the Project would be less than significant with mitigation.

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