



## Sunset and Everett Project

Environmental Case Number: ENV-2023-5529-SCEA

Related Case Number: CPC-2023-5528-DB-SPR-HCA-MCUB

**Project Location:** 1185, 1187, 1193, 1195, 1197, 1201, 1205, 1207, 1211, 1215, 1221, 1225, 1229, 1233, 1239, 1243, 1245, 1247 W. Sunset Boulevard and 917 N. Everett Street, Los Angeles, CA 90026

**Community Plan Area:** Silver Lake-Echo Park-Elysian Valley

**Council District:** 1 - Hernandez

**Project Description:** The Project Site is located on the east side of Sunset Boulevard, north of Everett Street, in the Silver Lake-Echo Park-Elysian Valley Community Plan area of the City of Los Angeles. The Site is currently vacant. The Applicant proposes the development of a mixed-use project comprised of two buildings with 327 residential units that include 41 Very Low Income affordable units and approximately 9,462 square feet of ground-floor commercial space for a total floor area of 321,300 square feet. Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following: 1) **Density Bonus Compliance Review (DB)**, pursuant to LAMC Section 12.22 A.25(g)(3), for a Project having 327 residential dwelling units, including 41 units reserved for Very Low Income households, with the following On and Off-Menu Incentives: a) **On-Menu Incentive**, for an increase in the Floor Area Ratio (FAR) to 3.0:1 in lieu of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone. b) **Off-Menu Incentive**, for a 30% reduction in open space to allow 24,540 in lieu of the otherwise required 35,050 square feet; c) **Off-Menu Incentive**, for additional height and stories: for Building A, for a 34-foot height increase for a height of 91 feet as measured from grade, (57 feet plus 34 feet) and an 85-foot height as measured from Plumb Height (45 feet plus 40 feet) and seven stories in lieu of the otherwise allowed three stories; and for Building B, for a 29-foot height increase for a height of 86 feet as measured from grade (57 feet plus 29 feet) and an 81.5-foot height as measured from Plumb Height (45 feet plus 36.5 feet) and seven stories in lieu of the otherwise allowed three stories. 2) **Site Plan Review (SPR)** pursuant to LAMC Section 16.05, for a development project that results in an increase of 50 or more dwelling units and/or guest rooms. 3) **Main Conditional Use Permit (MCUB)**, pursuant to LAMC Section 12.24.W.1 of Chapter 1 and LAMC Section 13.B.2.2 of Chapter 1A, to allow the sale and dispensing of a full line of alcoholic beverages for on-site and off-site consumption, in conjunction with a total of 9,462 square feet of potential indoor and outdoor restaurant space for up to five establishments with up to 300 indoor seats, and 75 outdoor seats, for a total of up to 375 patrons. 4) Approval of a **Haul Route** for a project located within a Special Grading Area with greater than 1,000 cubic yards of export.

**PREPARED FOR:**

The City of Los Angeles  
Los Angeles City Planning

**PREPARED BY:**

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**APPLICANT:**

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Properties Corporation  
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March 2024

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# Section 1

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## Introduction

An application for the proposed Sunset and Everett Project (Project) has been submitted to the City of Los Angeles Department of City Planning (Department of City Planning) for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA).

This Sustainable Communities Environmental Assessment (SCEA) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. As part of this SCEA, an Initial Study has been prepared (refer to Section 5, Environmental Impact Analysis, of this SCEA) in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). For preparation of the Initial Study, the City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. Based on the analysis provided within this SCEA, the City has concluded that the Project qualifies as a Transit Priority Project (TPP), is consistent with an adopted Sustainable Communities Strategy (SCS) that has been accepted by the California Air Resources Board (CARB) as meeting the State's greenhouse gas (GHG) reduction targets, and that the Project would not result in significant impacts on the environment. This SCEA is intended as an informational document, which is ultimately required to be considered and adopted by the decision-making body of the City in conjunction with approval of the Project.

## 1 Purpose

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

Public Resources Code Section 21155.2(b)(1) requires that an Initial Study be prepared for each SCEA. An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If a qualifying project meets certain criteria described below and the Initial Study shows that any potential significant effects would be avoided or mitigated to a point where clearly no significant effects would occur through project mitigation measures, a SCEA may be prepared. If it is determined in the Initial Study that there is substantial evidence, in light of the whole record before

the agency, that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) is normally required.<sup>1</sup>

## 1.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, also known as the “Sustainable Communities and Climate Protection Act of 2008,” which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s GHG emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations to incorporate an SCS into the regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the CARB. Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria. The SCEA is one of these streamlining tools.

The Southern California Association of Governments (SCAG) is the metropolitan planning organization 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 adopted Resolution 20-624-1, which approved the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS, also known as Connect SoCal) in its entirety. For the SCAG region, CARB has set GHG emissions reduction targets at 19 percent below 2005 per capita emissions levels by 2035. SCAG’s resolution adopting the 2020–2045 RTP/SCS also determined that the SCS includes strategies to meet the requirements of SB 375 to achieve these GHG emission reduction goals and directed SCAG staff to submit the 2020–2045 RTP/SCS to CARB for review and certification in this regard. On October 30, 2020, pursuant to Executive Order No. G-20-239, CARB “accept[ed] the SCAG determination that its 2020 SCS would, when implemented, meet the emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels.”

SB 375 allows the City, acting as Lead Agency, to prepare a SCEA as the environmental CEQA clearance for Transit Priority Projects (TPPs), as described below, that are consistent with the 2020–2045 RTP/SCS.

## 1.2 Purpose and Content of a SCEA

The purpose of a SCEA is to evaluate the environmental effects of a project in accordance with CEQA and PRC Sections 21155 and 21155.2. In addition, a SCEA must evaluate a project’s consistency with SCAG’s RTP/SCS and incorporate feasible mitigation measures, performance standards, and/or criteria from prior applicable EIRs into the proposed project.

The SCEA form of CEQA documentation was established by SB 375 to provide streamlined environmental review for certain TPPs. TPPs are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within one-half mile

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

of a major transit stop or high-quality transit corridor (Public Resources Code Section 21155(b)). The intent of the CEQA streamlining provisions is to reduce documentation and redundancy and to provide an incentive for TPPs that are consistent with a larger effort to reduce GHG emissions by integrating transportation and land use planning.

A SCEA is comparable to a Mitigated Negative Declaration (MND) in that the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a less than significant level. A SCEA must also 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 considered cumulatively considerable. Also, a SCEA is not required to reference, describe, or discuss growth-inducing impacts and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network.

A draft of the SCEA shall be circulated for a public comment period of not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA. The lead agency's decision to review and approve a project with a SCEA shall be reviewed under the substantial evidence standard.

## **2 Organization of the SCEA**

This SCEA is organized as follows:

### **1 Introduction**

The Introduction describes the purpose and content of the SCEA and provides an overview of the CEQA process.

### **2 Executive Summary**

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

### **3 Project Description**

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

### **4 SCEA Criteria And Consistency Analysis**

The SCEA Criteria and Consistency Analysis demonstrates that the Project qualifies as a Transit Priority Project and is consistent with the Sustainable Communities Strategy.

### **5 Evaluation Of Environmental Impacts**

The Evaluation of Environmental Impacts contains the completed Initial Study Checklist and the environmental factors that would be potentially affected by the Project. The Initial Study Checklist

includes existing mitigation measures from the RTP/SCS and any other relevant plans and demonstrates why they have or have not been incorporated into the Project.

## **6 Mitigation Monitoring Program**

Outlines the implementation of the Project’s mitigation measures and project design features and identifies enforcement and monitoring agencies responsibilities.

## **7 Appendices**

Includes various documents, technical reports, and information used in preparation of the SCEA and can be found in the case file at the City of Los Angeles Department of City Planning.

# **3 CEQA Process**

Below is a general background and overview of the CEQA process. The CEQA process is guided by the CEQA statutes and guidelines, which can be found on the State of California’s website (<http://resources.ca.gov/ceqa>).

The City has prepared this SCEA to determine if the Project qualifies as a TPP, is consistent with the SCS, and if it may have a significant effect on the environment. This SCEA determined that the Project meets the criteria for a SCEA and would not have a significant effect on the environment. A Notice of Completion and Availability (NOC/NOA) is circulated to notify public agencies and the general public that a draft of the SCEA is available for review and comment for a period of at least 30 days. CEQA requires that the legislative body (i.e., City Council) or planning commission of the lead agency conduct a public hearing and consider all comments received prior to acting on the SCEA. The lead agency may then adopt the SCEA, provided it 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.

# Section 2

## Executive Summary

<b>PROJECT TITLE</b>	<b>Sunset and Everett Project</b>
ENVIRONMENTAL CASE NO.	ENV-2023-5529-SCEA
RELATED CASES	CPC-2023-5528-DB-SPR-HCA-MCUB

<b>PROJECT LOCATION</b>	<b>1185, 1187, 1193, 1195, 1197, 1201, 1205, 1207, 1211, 1215, 1221, 1225, 1229, 1233, 1239, 1243, 1245, 1247 W. Sunset Boulevard and 917 N. Everett Street, Los Angeles, CA 90026</b>
COMMUNITY PLAN AREA	Silver Lake-Echo Park-Elysian Valley
GENERAL PLAN DESIGNATION	General Commercial
ZONING	C2-1VL
COUNCIL DISTRICT	1 - Hernandez

<b>LEAD AGENCY</b>	<b>City of Los Angeles</b>
CITY DEPARTMENT	Los Angeles City Planning
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<b>APPLICANT</b>	<b>Aragon (Sunset/Everett) Properties Corporation</b>
ADDRESS	1750 Glendale Boulevard, Unit 102 Los Angeles, CA 90026
PHONE NUMBER	(818) 726-4818

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would be potentially affected by the Project, as indicated by the checklist on the following pages (refer to **Section 5, Environmental Impact Analysis**, of this SCEA).

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality                      | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities/Service Systems          |
| <input type="checkbox"/> Energy                           | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology/Soils                    | <input type="checkbox"/> Population/Housing            | <input type="checkbox"/> Mandatory Findings of Significance |
|   |  | <input checked="" type="checkbox"/> None Identified         |

**DETERMINATION**

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that 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.

Esther Ahn, City Planner		March 14, 2024
PRINTED NAME, TITLE		DATE

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

# Section 3

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## Project Description

This section is based on the following item, which is included as **Appendix A** to this SCEA:

**A**     Plans, KTG Architecture and Planning, February 6, 2024

### 1 Environmental Setting

#### 1.1 Project Location

The Project Site is located on the east side of Sunset Boulevard, north of Everett Street, in the Silver Lake-Echo Park-Elysian Valley Community Plan area of the City of Los Angeles (City) in the County of Los Angeles (County).

The Site is approximately 0.5 mile north of Downtown Los Angeles and the Pacific Ocean is approximately 14 miles west of the Site. The Site is 950 feet south of Vin Sculley Avenue entrance, which provides access to the Sunset Gate to Dodger Stadium.

See **Figure 3-1, Regional Map**, for the location of the Project within the context of the City.

See **Figure 3-2, Aerial Map**, for an aerial view of the Site and the immediate surrounding area.

#### 1.2 Surrounding Land Uses

North adjacent to the Site are 5 separate 2-story multi-family residential bungalow buildings (1251-1255 Sunset Boulevard). These buildings are vacant and appear abandoned. This area is zoned C2-1VL.

South across Everett Street is an auto repair building (currently Seng's Auto Repair, 1165 Sunset Boulevard). This area is zoned C2-1VL.

West across Sunset Boulevard are commercial and residential buildings, from north to south:

- Vacant lot (1242-1246 Sunset Boulevard)
- 2-story multi-family residential (currently Node Los Angeles Sunset, 1236-1240 Sunset Boulevard)
- 3-story multi-family residential (currently SCSH Development, 1234 Sunset Boulevard)
- 2-story multi-family residential (1230-1232 Sunset Boulevard)
- 2-story commercial and bar (currently Bar Henry, 1226-1228 Sunset Boulevard)
- 3-story residential and commercial (1214-1220 Sunset Boulevard)
- 3 separate 2-story multi-family residential (1202-1212 Sunset Boulevard)

- 1-story residential building (1186-1192 Sunset Boulevard)

East adjacent to the Site are several 1- to 3-story, multi-family residential buildings (921-981 Everett Street). This area is zoned [Q]R3-1VL and C2-1VL.

The nearest residential uses:

- Multi-family residential building (921-981 Everett Street), 5 feet east of the Site
- Multi-family residential building (1251-1255 Sunset Boulevard), 5 feet north of the Site. Note these buildings are vacant and abandoned.
- Multi-family residential buildings (along west side of Sunset Boulevard), 100 feet west of the Site
- Multi-family residential buildings (1190 Sunset Boulevard), 110 feet west of the Site

The nearest schools:

- Little Friends Head Start Pre-School (707 Kensington Road), approximately 500 feet west
- Foundation for Early Childhood Education (1010 Douglas Street), approximately 1,150 feet northwest
- Downtown Magnets School (1081 Temple Street), approximately 1,400 feet south
- Evans Adult School (717 Figueroa Street), approximately 1,600 feet southeast

The nearest historic resources in the vicinity:<sup>1,2</sup>

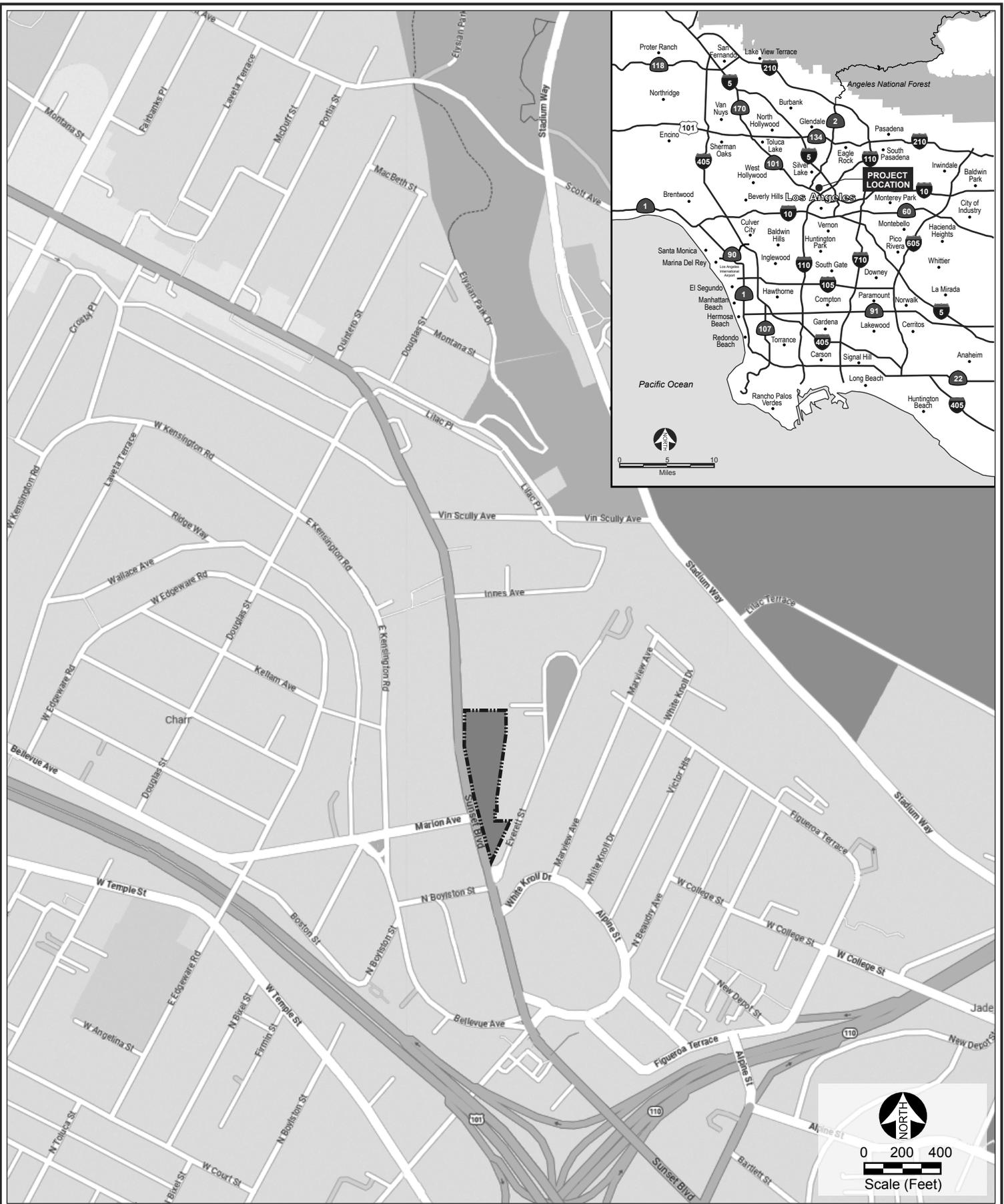
- Angelino Heights Historic Preservation Overlay Zone (HPOZ), 275 feet west of the Site with frontage along Kensington Road<sup>3</sup>
- Restovich House (1001 Everett Street)<sup>4</sup>, 160 feet northeast of the Site
- Metropolitan Water District Complex (1111 Sunset Boulevard), 200 feet south of the Site
- Sunset Streetcar Mixed-Use Historic District (1282-1298 Sunset Boulevard), 340 feet northwest of the Site
- Sunset-East Kensington Public Stairways (1302 Sunset Boulevard and 1270 Sunset Boulevard), 235 feet northwest of the Site

<sup>1</sup> HistoricPlacesLA.org and NavigateLA, Historic layer: <https://navigatepla.lacity.org/navigatepla/>

<sup>2</sup> Historical Resources Technical Report, GPA, June 2023, included as **Appendix D-1** of this SCEA.

<sup>3</sup> <https://planning.lacity.org/preservation-design/overlays/angelino-heights>

<sup>4</sup> <http://historicplacesla.org/reports/3a404d67-7135-4b3b-9035-473dc7162687>

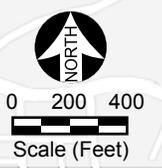


**Legend**

 Project Site

Source: Google Maps 2023.

Figure 3-1  
Regional Location Map





**Legend**



Project Site

Source: Google Maps 2023.

Figure 3-2  
Aerial Map

## 1.3 Regional and Local Access

Regional access is provided by:

- US-101 (Hollywood) Freeway, 1,080 feet southwest of the Site
- SR-110 (Harbor) Freeway, 1,450 feet southeast of the Site

Local access is provided by:<sup>5</sup>

- Sunset Boulevard (Avenue I in the Mobility Plan 2035), adjacent west of the Site
- Everett Street (Local Street Standard), adjacent south of the Site
- Marion Street (Collector), 100 feet west of the Site
- Beaudry Avenue (Avenue II), 850 feet south of the Site

## 1.4 Bicycle Facilities

The following bicycle facilities are located nearby:<sup>6</sup>

- Bicycle-friendly streets:<sup>7</sup>
  - Sunset Boulevard, adjacent west of the Site
  - Marion Avenue, 100 feet west of the Site
  - Beaudry Avenue, 850 feet south of the Site
- Metro Bike Share station:<sup>8</sup>
  - Sunset Boulevard and Lilac Place, 1,450 feet north of the Site
  - Figueroa Street and Cesar Chavez Avenue, 2,000 feet southeast of the Site

## 1.5 Pedestrian Facilities

There is a sidewalk along the Project Site's west side on Sunset Boulevard and southern boundary on Everett Street. Striped crosswalks are provided at all legs of the nearest signalized intersection (Sunset Boulevard and Marion Avenue, directly west of the Site).

<sup>5</sup> NavigateLA, Mobility Plan 2035: <https://navigatea.lacity.org/navigatea/>, accessed January 5, 2023.

<sup>6</sup> LADOT Programs: <https://ladotlivablestreets.org/programs/active-transportation/maps>

<sup>7</sup> According to LADOT's Bike Program, Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians. <https://ladotbikeblog.wordpress.com/bfs/>

<sup>8</sup> Metro Bike Share: <https://bikeshare.metro.net/stations/>, accessed January 5, 2023.

## 1.6 Public Transit

The Site is within a High-Quality Transit Area (HQTA),<sup>9</sup> which are areas within one-half mile of a high-quality transit corridor, which is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.<sup>10</sup> The City of Los Angeles defines peak commute hours as between 6:00 AM and 9:00 AM and between 3:00 PM and 7:00 PM.<sup>11</sup>

Los Angeles County Metropolitan Transportation Authority (Metro)<sup>12</sup> and Los Angeles Department of Transportation (LADOT)<sup>13</sup> operate public transit in the area, as shown in **Table 3-1, Public Transit**.

**Table 3-1  
Public Transit**

Line	Type	Direction	Stop	Distance to Site	Service (Peak Period)
<b>Metro</b>					
4	Bus	West-east on Sunset	Marion	Adjacent west	7.5 minutes
10	Bus	West-east on Temple	Edgeware	1,515 feet southwest	10-20 minutes
48	Bus	West-east on Temple	Edgeware	1,515 feet southwest	30 minutes
55	Bus	North-south on Figueroa	Cesar Chavez	2,075 feet southeast	12-15 minutes
60	Bus	West-east on Sunset	Figueroa	2,075 feet southeast	5-8 minutes
92	Bus	North-south on Edgeware	Bellevue	1,275 feet west	20 minutes
A and E	Train	Grand Ave Arts / Bunker Hill Station		4,500 feet south	10 minutes
<b>LADOT</b>					
Pico Union	Bus	North-south on Edgeware	Bellevue	1,275 feet west	14 minutes
Lincoln Hts	Bus	West-east on Cesar Chavez	Figueroa	2,075 feet southeast	30 minutes
Distances are measured from the nearest Project Site property line to the bus stop or station entrance. Metro 4 Line schedule (June 25, 2023): <a href="https://www.metro.net/riding/schedules/?line=4-13168">https://www.metro.net/riding/schedules/?line=4-13168</a> Metro 10/48 (June 25, 2023): <a href="https://www.metro.net/riding/schedules/?line=10-13168">https://www.metro.net/riding/schedules/?line=10-13168</a> Metro 55 Line schedule (June 25, 2023): <a href="https://www.metro.net/riding/schedules/?line=55-13168">https://www.metro.net/riding/schedules/?line=55-13168</a> Metro 60 Line schedule (June 25, 2023): <a href="https://www.metro.net/riding/schedules/?line=60-13168">https://www.metro.net/riding/schedules/?line=60-13168</a> Metro 92 Line schedule (June 25, 2023): <a href="https://www.metro.net/riding/schedules/?line=92-13168">https://www.metro.net/riding/schedules/?line=92-13168</a> Metro A Line (June 16, 2023): <a href="https://www.metro.net/riding/schedules/?line=801">https://www.metro.net/riding/schedules/?line=801</a> Metro L Line (June 16, 2023): <a href="https://www.metro.net/riding/schedules/?line=804">https://www.metro.net/riding/schedules/?line=804</a> LADOT Lincoln Hts (July 2023): <a href="https://www.ladottransit.com/dash/routes/lincolnheights/lincolnheights.html">https://www.ladottransit.com/dash/routes/lincolnheights/lincolnheights.html</a> LADOT Pico Union/Echo Park (July 2023): <a href="https://www.ladottransit.com/dash/routes/puep/puep.html">https://www.ladottransit.com/dash/routes/puep/puep.html</a>					

<sup>9</sup> SCAG, HQTA 2016 based on the 2020-2045 RTP/SCS: <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954>, accessed January 5, 2023.

<sup>10</sup> SCAG, Connect SoCal, Active Transportation Technical Report, page 26: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_active-transportation.pdf?1606001530](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_active-transportation.pdf?1606001530), accessed January 5, 2023.

<sup>11</sup> Transit Oriented Communities Affordable Housing Incentive Program Guidelines (February 26, 2018), Appendix A: <https://planning.lacity.org/odocument/39fae0ef-f41d-49cc-9bd2-4e7a2eb528dd/TOCGuidelines.pdf>, accessed October 20, 2023.

<sup>12</sup> Metro System Map: <https://www.metro.net/riding/guide/system-maps/>, accessed January 5, 2023.

<sup>13</sup> LADOT Transit: <https://www.ladottransit.com/dash/>, accessed January 5, 2023.

### 3.7 Planning and Zoning

**Table 3-2, Project Site**, lists the Site’s APNs, zoning, and General Plan land use designation. The Site is zoned C2-1VL (Commercial zone in Height District 1VL) and is subject to a General Commercial land use designation.<sup>14</sup> Corresponding zones for this designation are RAS3, CR, C1.5, C2, C4, and P. In addition to commercial uses, the C2 zone permits residential uses at one (1) dwelling unit per 400 square feet of lot area. Height District 1VL, in conjunction with the Site’s C2 zoning, permits a base 1.5:1 Floor Area Ratio (FAR) and a maximum height of 45 feet.

**Table 3-2  
Project Site**

Address	Lot	APN	Zone	Land Use
1185, 1187 W. Sunset Boulevard	1	5406-016-028	C2-1VL	General Commercial
None	-			
1193 W. Sunset Boulevard, 917 N. Everett Street	2	5406-016-003		
1195, 1197 W. Sunset Boulevard	3			
1201 W. Sunset Boulevard	4	5406-016-006		
1205, 1207 W. Sunset Boulevard	5	5406-016-007		
1211 W. Sunset Boulevard	7	5406-016-010		
1215 W. Sunset Boulevard	9	5406-016-011		
1221 W. Sunset Boulevard	11	5406-016-013		
1225 W. Sunset Boulevard	13	5406-016-016		
1229 W. Sunset Boulevard	15			
1233 W. Sunset Boulevard	17	5406-016-019		
1239 W. Sunset Boulevard	19			
1243, 1245 W. Sunset Boulevard	21	5406-016-021		
None		5406-016-023		
1247 W. Sunset Boulevard	23			

Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, January 2023.

The Project Site is located within a Methane Zone.<sup>15</sup>

The Project Site is located within a Special Grading Area (SGA) according to the Bureau of Engineering (BOE).<sup>16</sup>

The Project Site has the following zoning classifications:

- ZI-2452 Transit Priority Area in the City of Los Angeles
- ZI-2512 Housing Element Inventory of Sites
- ZI-2374 State Enterprise Zone: East Los Angeles

The Project Site is identified in ZIMAS as being located within a Transit Oriented Communities (TOC) housing incentive area (Tier 2) due to being located within one-half mile of a qualified Major

<sup>14</sup> Los Angeles Zoning Summary: <https://planning.lacity.org/zoning/regulations-summary>

<sup>15</sup> <http://zimas.lacity.org>, accessed August 7, 2023.

<sup>16</sup> <http://zimas.lacity.org>, accessed August 7, 2023.

Transit Stop<sup>17</sup> at the intersection of Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street, 2,075 feet southeast of the Site, which is served by Metro bus lines 4, 55, and 60. As shown by **Table 3-1**, these lines have headways of 15 minutes or less during peak hours.

### 3.8 Existing Conditions

The lot area before dedication is 107,100 square feet (2.459 acres).<sup>18</sup> The Project Site is vacant of all structures and contains 6,000 square feet of asphalt.

The Project Site contains several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds. There are seven Mexican fan palm (*Washingtonia robusta*) street trees along Sunset Boulevard.<sup>19</sup> Therefore, there is nothing onsite that constitutes a protected tree or shrub.<sup>20</sup>

## 4 Proposed Project

### 4.1 Project Overview

The Project will construct a mixed-use residential and commercial development with 327 residential units (286 market-rate units and 41 affordable units), and 9,462 square feet of commercial space that could be occupied by high-turnover sit-down restaurant uses.<sup>21</sup> The Project consists of two buildings:

- Building A is located along Sunset Boulevard. Building A is 7-stories with 4 levels of Type IIIA construction over 3 levels of Type I podium.
- Building B is located at the corner of Sunset Boulevard and Everett Street. Building B is 7-stories with 5 levels of Type IIIA construction over 2 levels of Type I podium.

The Project includes 13 studio units, 230 1-bedroom units, 79 2-bedroom units, and 5 3-bedroom units. Six of the units on the ground floor along Sunset Boulevard in Building A would be live/work units. See **Figure 3-3, Site Plan**, for the plan of the Project.

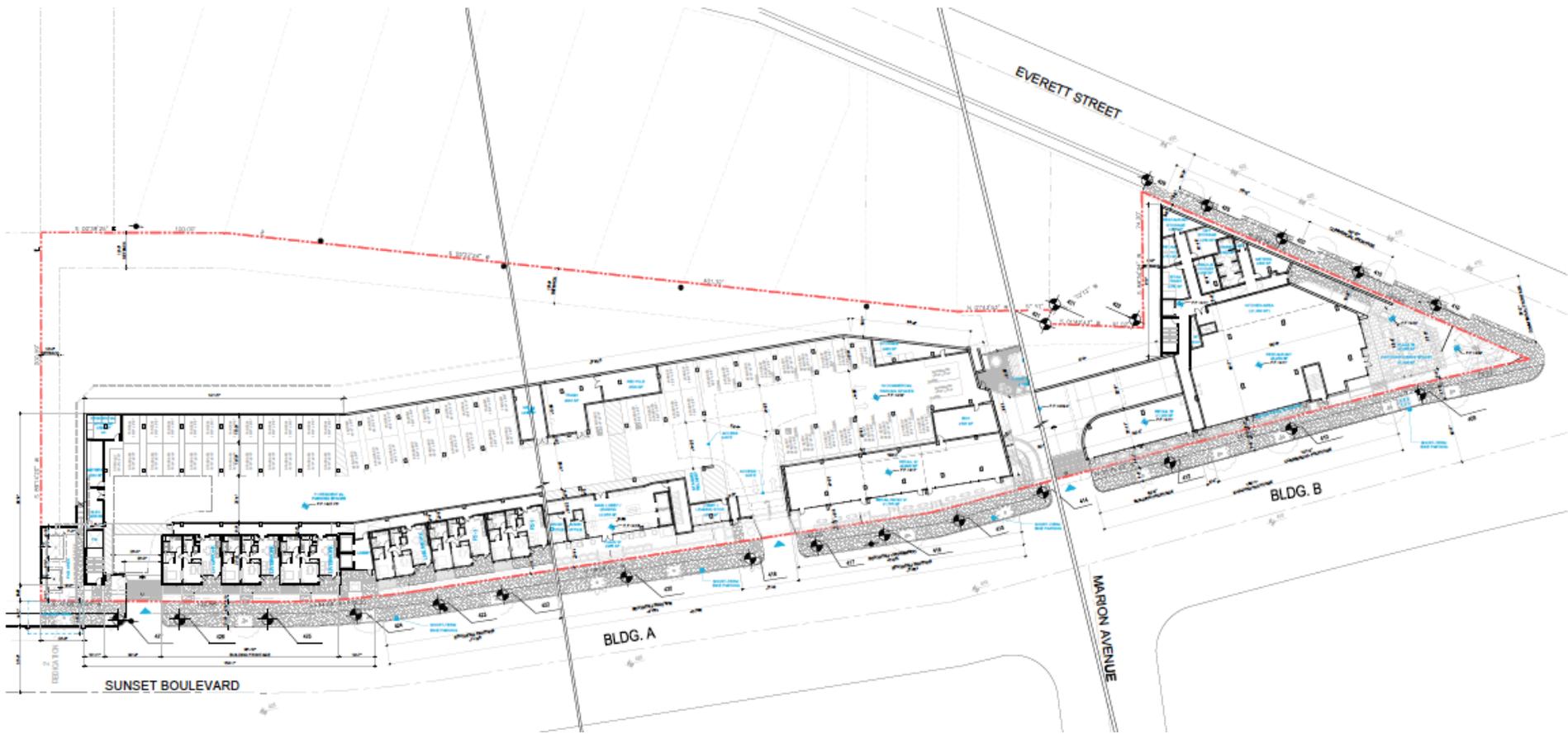
<sup>17</sup> Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

<sup>18</sup> Plans, KTG Architecture and Planning, February 6, 2024, included as **Appendix A** of this SCEA.

<sup>19</sup> Protected Tree Report, JTL Consultants, August 21, 2023, included as **Appendix C** of this SCEA.

<sup>20</sup> LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

<sup>21</sup> Transportation Assessment, Fehr & Peers, October 2023, included as **Appendix K-1** of this SCEA.



Source: KTG Architecture + Planning, 2024.

Figure 3-3  
Site Plan

## 4.2 Design and Architecture

See **Appendix A** of this SCEA for floor plans, elevations, sections, and renderings. The Project has been designed as integrated structures with articulation and variation consistent with applicable City design guidance. Parking spaces within the buildings (ground and subterranean levels) and residential units located within the buildings have been integrated into the overall architectural theme of the Project.

Commercial spaces will be served by a mix of tenants, including dining and retail. As such, a Main Conditional Use Permit (MCUB) for the sale and consumption of a full line of alcoholic beverages for on-site and off-site consumption has been included with this request to assist with easier tenanting of these spaces.

The buildings' ground levels will incorporate pedestrian scale uses and design, with a street fronting glass. In addition, the buildings' proposed design architecturally differentiates the base of the building from the residential above including colored elements. The upper residential portions of the building incorporate varied articulation including balconies.

The City of Los Angeles Residential Design Guidelines indicate that projects should alternate different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive facades. Building A abuts public streets on one of the four building elevations along Sunset Boulevard. Along this street frontage, there is a variation between the ground floor commercial and residential units and upper residential floors. In addition, the project breaks planes frequently, often between each floor through the use of open space, limiting flat walls. Window openings and balconies punctuate the building's façade and activate the building's elevation at the upper floor levels. Building B abuts both Sunset and Everett on two of its six sides. Building B uses similar techniques, breaking planes and creating overhangs. Both buildings provide large windows, the glass provides a change of material and contrasts with the white walls, the glass railings compliment this style further.

In accordance with the spirit and intent of the Silver Lake-Echo Park-Elysian Valley Community Plan and Citywide Design Guidelines, the buildings use a variety of architectural materials and building planes to create a human-scaled project at the street level and activate the frontage along Sunset Boulevard with a visually compelling and clean design. The buildings feature a series of alternating balconies, glazing, and a white accent color to create an elevated look and add visual interest while avoiding dull and repetitive facades. Landscaping will also be included throughout the ground level pedestrian plaza, and the Project's roof decks to complement the architecture. Plant material has been selected for temperature hardiness and low water use.

The Project is designed with a façade that utilizes a variety of materials, such as trowel stucco, fiber cement, white metal, perforated metal, concrete, opaque glass, composite seating and decking.<sup>22</sup>

These materials add visual interest through different textures and colors. This variation, along with insets and offsets, and street-facing residential windows and storefront glazing at the ground floor, separates the upper residential portions of the buildings from the ground floor parking and

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<sup>22</sup> [Plans](#), KTG Architecture and Planning, February 6, 2024, included as **Appendix A** of this SCEA.

lobby entrance, avoids a dull or repetitive façade, and contribute to neighborhood safety by activating the Site and putting more “eyes on the street.”

The buildings provide façade treatments with balconies that highlight the residential nature of the building. All sides of the proposed buildings are articulated with colored elements, glass and metal, windows, and inset and offset architectural elements to create visual interest. Overall variation in building appearance is created with the use of various materials, windows of different widths, and balconies, the landscaped ground floor, and the transition of the ground floor to upper levels.

Rooftop equipment will be set back from the roof parapet edge and appropriately screened from public view. The Project is designed to minimize the visual impact of building mechanics and maintenance areas. Electrical rooms, storage rooms, and trash and recycling areas, are located within the building and are not visible from surrounding public streets and public view.

The Project Site is located in an urbanized and fully developed portion of the City. The built environment and proposed developments are characterized by a variety of architectural styles, age of buildings, type of developments, and size.

### 4.3 Density

See **Table 3-3** for the density calculation. Pursuant to the City’s General Plan and LAMC Sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum residential density within the C2 zone is generally one dwelling unit for every 400 square feet of lot area, resulting in a maximum density of 267.75 units under the LAMC. This number is rounded up to 268 units to achieve the Site’s base density pursuant to Density Bonus Law.

The Project proposes to set aside 15% (41 units) of the base density for Very Low Income (VLI) units, which under Density Bonus Law and the City’s density bonus ordinance, permits a density bonus of 35%, as well as up to three density bonus incentives or concessions. The Project is electing to utilize a density bonus of only 22% to achieve a total of 327 units, 286 of which will be market rate units and 41 of which will be restricted to VLI households

With a Site area of 2.459 acres, the Project results in a density of 133 units per acre.

**Table 3-3**  
**Density**

Lot Area	LAMC & Base Density		Density Bonus		Provided
	LAMC Rate	Base Density	Increase	Density	
107,100 sf	1 unit / 400 sf, or 267.75 units	268 units	+22% (+59 units)	327 units	Building A: 279 units Building B: 48 units <b>Total: 327 units</b>
LAMC Section 12.22.A.25(c)(7) Fractional Units. In calculating Density Bonus and Restricted Affordable units, any number resulting in a fraction shall be rounded up to the next whole number. <u>Plans</u> , KTG Architecture and Planning, February 6, 2024.					

## 4.4 Floor Area

See **Table 3-4** for the floor area and floor area ratio (FAR), or ratio of floor area to the Site's Buildable Area. Per the definition of Buildable Area in LAMC Section 12.03, for development of residential and mixed-use projects in the C2, C4, or C5 zones, Buildable Area shall have the same meaning of lot area. Therefore, the Site's Buildable Area is 107,100 square feet

Under the LAMC, in the C2 zone and Height District 1VL, FAR is normally limited to 1.5:1. With a buildable area of 107,100 square feet, the Site's floor area would therefore be limited to 160,650 square feet.

As noted above, the Project is eligible to receive up to three density bonus incentives/concessions. The Project is requesting an on-menu density bonus incentive (per LAMC Section 12.22.A.25(f)(4)(ii)) to allow an increase in the FAR to 3.0:1.<sup>23</sup> This will allow up to 321,300 square feet of floor area.

The Project proposes a total floor area of 321,300 square feet (3.0:1 FAR). This total is allocated as 311,838 square feet for residential uses and related amenities and 9,462 square feet for commercial restaurant use.

**Table 3-4  
Floor Area**

Buildable Area	LAMC		Density Bonus		Provided	
	FAR	Floor Area	FAR	Floor Area	FAR	Floor Area
107,100 sf	1.5:1	160,650 sf	3.0:1	321,300 sf	3.0:1	321,300 sf
Plans, KTG Architecture and Planning, February 6, 2024.						

## 4.5 Setbacks

In the C2, C4, and C5 zones, no front yards are required. Pursuant to LAMC Section 12.22.A.18(c)(3), no yard requirements shall apply to the residential portions of buildings located on lots in the CR, C1, C1.5, C2, C4, and C5 Zones used for combined commercial and residential uses, if such portions are used exclusively for residential uses, and abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. An interior side setback is required pursuant to LAMC Section 12.16.C.2 and a rear setback is required by LAMC Section 12.16.C.3.

See **Table 3-5** for the required setbacks for the Project. The Project is compliant with the setbacks for the C2-1VL Zone, and is entitled to zero-foot yards along both street frontages at Sunset Boulevard and Everett Street. The building is set back five feet from Sunset Boulevard, and five feet from Everett Street at the ground level, which increases to 13 feet and 5 inches for the residential floors above. The northern side yard has a nine foot setback, and the rear yard abutting

<sup>23</sup> This on-menu incentive is available to projects in commercial zones in Height District 1 (including 1VL) that front on a Major Highway, contain sufficient affordable units to qualify for a 35% density bonus, and are located within 1,500 feet of a Metro Rapid Bus Stop. The Project meets each of these criteria.

adjacent properties contains a nine foot setback at the commercial floors which steps back to a 19 feet setback for residential floors above.

**Table 3-5  
Setbacks**

Yard	Location	Required	Provided
Front	West - Sunset	0	5 feet
Side	South - Everett	0	13.5 feet
Side	North – Abutting property	9 feet	9 feet
Rear	East – Abutting property	19 feet	19 feet
LAMC 12.14.C.2 (C2/R4 Zones) Plans, KTG Architecture and Planning, February 6, 2024.			

## 4.6 Height

The Project Site is located in the C2 zone and Height District 1VL, which allows 45 feet height above grade (Plumb Height) and 3 stories in a building with a commercial component.

Pursuant to LAMC Section 12.21.1.B.2, whenever the highest point of elevation of the adjoining sidewalk or ground surface within a five-foot horizontal distance measured from the exterior wall of a building exceeds grade level by more than 20 feet, a building or structure may exceed the height in number of feet prescribed in this section by not more than 12 feet.

However, such additional height shall not be permitted to the extent that such additional height causes any portion of the building or structure to exceed a height in number of feet as prescribed by this section as measured from the highest point of the roof structure or parapet wall to the elevation of the ground surface which is vertically below this roof structure or parapet wall to the elevation of the ground surface which is vertically below this point of measurement. The Site is characterized by a sloping topography that makes this LAMC provision applicable to the Project. With the additional 12 feet provided by LAMC Section 12.21.1.B.2, the Site's base height is 57 feet.<sup>24</sup>

The Project is seeking an off-menu height incentive to allow the following building height measurements:

- Building A is 7 stories with a maximum height of 91 feet as measured from grade (57 feet Base Height plus 34 feet) and 85 feet as measured from Plumb Height (45 feet plus 40 feet).
- Building B is 7 stories with a maximum height of 86 feet as measured from grade (57 feet Base Height plus 29 feet) and 81.5 feet as measured from Plumb Height (45 feet and 36.5 feet).

<sup>24</sup> Pursuant to LAMC Section 12.21.1.B.3, chimney, exhaust ducts, solar water heaters, or any roof structure housing stairways, elevators or ventilation fans may also exceed the building height limit by up to five feet, but are not required to provide a setback from the perimeter of the roof. Where height is limited to 75 feet, roof structures for the housing of elevators and stairways may exceed the building height limit by up to 20 feet in height.

## 4.7 Open Space

**Table 3-6, Open Space**, provides the amount of required open space under the LAMC and the open space proposed to be provided by the Project. The Project at its proposed unit mix is required to provide 35,050 square feet of open space. The Project would request an off-menu density bonus incentive, for a 30% reduction in open space to require 24,535 square feet in lieu of the otherwise required 35,050 square feet.

The Project provides 24,540 square feet of qualifying open space, consisting of indoor amenities, roof decks, courtyards, and balconies. In addition, there will be 17,025 square feet of additional public and private open space that does not meet the definition in LAMC Section 12.21.G due to noncompliant dimensions, or being publicly accessible. Thus, the Project provides 41,565 square feet of public and private open space areas. There will be an approximately 45,000 gallon pool (20 feet x 60 feet).

**Table 3-6  
Open Space**

Use	Type	Quantity	Rate	Total (sf)
<b>Required</b>				
< 3 habitable rooms	Studio	13 units	100 sf / unit	1,300
	1-bedroom	230 units		23,000
= 3 habitable rooms	2-bedroom	79 units	125 sf / unit	9,875
> 3 habitable rooms	3-bedroom	5 units	175 sf / unit	875
<b>Subtotal Required</b>				<b>35,050</b>
<b>30% Reduction</b>				<b>(10,515)</b>
<b>Total Required</b>				<b>24,535</b>
<b>Provided</b>				
Common and Indoor		Indoor Amenities		5,913
Common and open to the sky		Courtyard A1 – Level 2		5,950
		Courtyard A2 – Level G2		1,630
		Roof Deck A1 – Level 7		2,975
		Roof Deck B1 – Level 7		758
		Roof Deck B2 – Level 7		1,064
		<b>Total Common Outdoor</b>		<b>18,290</b>
Private		Balconies Building A (104 x 50 sf)		<b>5,200</b>
		Balconies Building B (21 x 50 sf)		<b>1,050</b>
<b>Total Provided (Compliant)</b>				<b>24,540</b>
Other Open Space Not Included in Common Open Space Calculation				<b>17,025</b>
<b>Total Open Space</b>				<b>41,565</b>
Per LAMC 12.21.G.2				
Habitable Room - An enclosed subdivision in a residential building commonly used for living purposes, but not including any lobby, hall, closet, storage space, water closet, bath, toilet, slop sink, general utility room or service porch. A recess from a room or an alcove (other than a dining area) having 50 square feet or more of floor area and so located that it could be partitioned off to form a habitable room, shall be considered a habitable room.				
For the purpose of applying the open space requirements of Section 12.21 G., a kitchen as defined herein shall not be considered a habitable room. A studio and 1-bedroom units have less than 3 habitable rooms. A 2-bedroom has 3 habitable rooms. A 3-bedroom unit has greater than 3 habitable rooms.				
Plans, KTG Architecture and Planning, February 6, 2024.				

## 4.8 Landscaping

See **Table 3-7, Landscape Area and Tree Requirement**, for the required and provided landscape area and trees. Per LAMC Section 12.21.G.a.3, A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees. At least one 24-inch box tree for every four dwelling units shall be provided on site and may include street trees in the parkway.

The seven Mexican fan palms on the Sunset Boulevard sidewalk will be protected during the development project by installing tree protection fencing around the trees. The Project arborist will be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures.<sup>25</sup> Should any trimming or removal of these trees become necessary, any such activity would be performed in conformance with the requirements and policies of the City’s Urban Forestry Division, Bureau of Street Services regarding street trees.

The tree-of heaven trees onsite are generally considered an invasive plant, rather than trees. These will be removed to accommodate the proposed buildings.

The Project is required to provide 25 percent of the 18,290 square feet of common open space as landscaping, or 4,573 square feet. The Project will provide 12,881 square feet of landscaped common open space on levels 1 through level 7.<sup>26</sup> Additional landscaping will be provided on the slope portion to the rear of Building A. The landscape design has been developed in a manner which includes a variety of drought-tolerant and native species appropriate for the Southern California climate.

The Project will be required to provide at least 82 trees (327 units / 4). The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).<sup>27</sup>

The Project will comply with LAMC requirements for trees and landscaping.

**Table 3-7  
Landscape Area and Tree Requirement**

Use	Requirement	Quantity	Required	Provided
Landscape Area	25% of Common Open Space	18,290 sf	4,573 sf	12,881 sf
Trees	1 tree per 4 residential units	327 units	82 trees	83 trees
<u>Plans</u> , KTG Architecture and Planning, February 6, 2024.				

## 4.9 Site Coverage

See **Table 3-8, Site Coverage**, for the percentage of the Site covered by buildings, hardscape, and landscape.

<sup>25</sup> Protected Tree Report, JTL Consultants, August 21, 2023, included as **Appendix C** of this SCEA.

<sup>26</sup> Plans, KTG Architecture and Planning, February 6, 2024, included as **Appendix A** of this SCEA.

<sup>27</sup> Plans, KTG Architecture and Planning, February 6, 2024, included as **Appendix A** of this SCEA.

**Table 3-8  
Site Coverage**

	Building A		Building B		Total	
	Percent	Area	Percent	Area	Percent	Area
Building	42%	44,743 sf	11%	11,580 sf	53%	56,323 sf
Impervious / Hardscape	-	-	-	-	12%	12,852 sf
Pervious	-	-	-	-	35%	37,925 sf
<b>Total</b>	-	-	-	-	<b>100%</b>	<b>107,100 sf</b>
Plans, KTG Architecture and Planning, February 6, 2024.						

## 4.10 Trash, Loading, Mechanical Equipment

The Project will be designed to minimize the visual impact of trash receptacles and utility areas.

Trash and recycle rooms/spaces will be located within the building on Level 1, and are not visible from surrounding public streets and public view.

There is no loading area on the Site or surrounding street.

Utility rooms will be located within the building and not visible from surrounding public streets and public view.

Rooftop mechanical equipment will be set back from the roof parapet edge and appropriately screened from public view.

## 4.11 Access and Circulation

Vehicular access to the Project Site would be provided via two stop-controlled driveways and one-signalized driveway that would provide access to structured parking. There are currently 13 driveways serving the Project Site along Sunset Boulevard. The Project proposes reducing vehicular access points to three driveways (Access A, B, and C) on Sunset Boulevard. The other existing vehicle access points to the Site would be closed. Below is a description of the Project's proposed driveways:

- Access A: The Project proposes a left- and right-in/right-out only driveway off of Sunset Boulevard at the northern end of the Site. Outbound left-turns from this driveway would not be permitted.
- Access B: The Project proposes a left- and right-in/right-out only driveway off of Sunset Boulevard in the middle of the Site. Outbound left-turns from this driveway would not be permitted.
- Access C: The Project proposes a full-access driveway that would form the fourth leg (west facing) of the signalized intersection of Sunset Boulevard and Marion Avenue.

The Project would provide residential pedestrian access via two lobbies, one midblock on Sunset Boulevard for Building A and one on Everett Street for Building B.

Additionally, all ground floor units in Building A facing Sunset Boulevard will have entries directly onto the street. Retail pedestrian access will be provided into each retail store along Sunset Boulevard.

## 4.12 Vehicle Parking

**Table 3-9, Vehicle Parking**, provides details regarding the Project’s provided vehicle parking. The Project Site is located within an AB 2097 Reduced Parking Area, which prohibits the City from imposing or enforcing minimum parking requirements; as such, the Project does not require any parking.

The Project would voluntarily provide 263 on-site parking spaces at one subterranean, one partially subterranean, and one at-ground/above-grade levels to be shared amongst all of the uses on the Site.

**Table 3-9  
Vehicle Parking**

	<b>AB 2097 Required</b>	<b>Provided</b>
<b>Total</b>	<b>0</b>	<b>263</b>
Per LAMC 12.22 A.4. Plans, KTG Architecture and Planning, February 6, 2024.		

### 4.12.1 Electric Vehicle Parking

Pursuant to LAMC Section 99.04.106.4.2.2 (Multi-family Development Projects with 20 or More Dwelling Units, Hotels and Motels with 20 or More Sleeping Units or Guest Rooms), the Project will be required to provide the following percentages of electric vehicle charging spaces:

- **EV Capable.** Thirty percent of the total number of parking spaces on a building site, provided for all types of parking facilities, shall be electric vehicle charging spaces (EV spaces) capable of supporting future Level 2 EVSE.
- **EV Ready (EVSE).** Twenty-five percent of the total number of parking spaces shall be equipped with low power Level 2 EV charging receptacles. The number of EV Ready parking spaces may be counted toward the total number of EV Capable parking spaces required.
- **EV Chargers (EVCS).** Ten percent of the total number of parking spaces shall be equipped with Level 2 EVSE.

**Table 3-10, Electric Vehicle Parking**, provides the amount of required and provided electric vehicle parking. The Project will provide 172 EV spaces (79 will be EV capable of which 66 will be EVSE, and an additional 27 will have EVCS).

**Table 3-10  
Electric Vehicle Parking**

Parking Provided	Required			Provided		
	EV Capable	EV Chargers	EV Ready	EV Capable	EV Chargers	EV Ready
263	79	66	27	79	66	27
Pursuant to LAMC Section 99.04.106.4.2, Calculations for spaces shall be rounded up to the nearest whole number. EV Capable = 30% required. EVSE - electric vehicle supply equipment for future charging stations. 25% of total is required. EVCS – electric vehicle charging stations installed. 10% of total is required. 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen) and 2023 LAGBC. Section 4.106.4.2.2. Multifamily development projects with 20 or more dwelling units, hotels and motels with 20 or more sleeping units or guest rooms. <u>Plans</u> , KTG Architecture and Planning, February 6, 2024.						

## 4.13 Bicycle Parking

**Table 3-11, Bicycle Parking**, provides the amount of required and provided bicycle parking for the Project. LAMC 12.21.A.16(a) requires new projects to provide bicycle parking spaces. Short-term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long-term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather.

The Project will provide 183 bicycle parking spaces (21 short-term and 162 long-term). Bicycle parking is located on the first and second levels within two rooms accessible from the parking spaces.

**Table 3-11  
Bicycle Parking**

Use	Quantity	Short-Term Spaces			Long-Term Spaces		
		Rate	Required	Provided	Rate	Required	Provided
Residential	1-25 units	1 / 10 units	2.5	16	1 / 1 unit	25	157
	26-100 units	1 / 15 units	5		1 / 1.5 units	50	
	101-200 units	1 / 20 units	5		1 / 2 units	50	
	201+ units	1 / 40 units	3		1 / 4 units	32	
<b>Subtotal</b>			<b>16</b>	<b>16</b>		<b>157</b>	<b>157</b>
Commercial	9,462 sf	1 / 2,000 sf	5	5	1 / 2,000 sf	5	5
<b>Total</b>			<b>21</b>	<b>21</b>		<b>162</b>	<b>162</b>

LAMC Table 12.21 A.16 (a)(1)(i) and Ordinance No. 185,480.

A minimum of two short-term bicycle parking spaces shall be provided in all cases.

Per LAMC Section 12.21.A.16(b): When the application of these regulations results in the requirement of a fractional bicycle space, any fraction up to and included on-half may be disregarded, and any fraction over one-half shall be construed as requiring one bicycle parking space.

Therefore the 2.5 spaces rounds down to 2 spaces.

Plans, KTG Architecture and Planning, February 6, 2024.

## 4.14 Lighting and Signage

Project signage will include building identification, wayfinding, and security markings. Signage will be similar to other signage in the Project’s vicinity.

Exterior lighting will be shielded to reduce glare and eliminate light being cast into the night sky. Security lighting will be integrated into the overall architecture and landscaping.

The Project will also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of LAMC Section 93.0117(b).

All pedestrian walkways and parking entrances will be illuminated with ambient night lighting for safety and access. Lighting will complement and highlight the architectural details, while being shielded from the adjacent residences. As the majority of the common open space is located at the interior or on upper roof levels of the site, residents may utilize these common spaces after typical daytime hours without disturbing nearby residences or other uses. All on-site common open space lighting will be oriented inward, while ambient lighting will gently illuminate spaces along the street.

## 4.15 Site Security

The Project will provide a passive security program to ensure the safety of its residents, employees, and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services will include secured building access/design to residential areas; lighting of building entryways and areas; and possible video surveillance. The security program will include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems; and security lighting.

## 4.16 Sustainability Features

The Project will comply with the applicable Los Angeles Green Building Code (LAGBC, 2023 version effective January 1, 2023)<sup>28</sup> and the applicable California Green Building Standards Code (CalGreen, 2022 version effective January 1, 2023).<sup>29</sup> The applicability is determined when the Project is submitted and accepted by plan check.

All building systems will meet applicable Title 24 Energy Standards. These standards will reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure.

The sustainability features to be incorporated into the Project will include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor

<sup>28</sup> City of Los Angeles Department of Building and Safety, Green Building, available at <http://ladbs.org/forms-publications/forms/green-building>, accessed on January 6, 2023.

<sup>29</sup> California Building Codes: <https://www.dgs.ca.gov/BSC/CALGreen>, accessed on January 6, 2023.

and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks will serve to help reduce solar heat gain and facilitate possible stormwater retention on-site.

The Project will recycle and reuse building and construction materials to the maximum extent feasible.

The Project will provide EV spaces as required by the LAMC.

The Project will be required to be all-electric for cooking, heating/cooling, and water heating within both buildings. The only exception is cooking equipment within kitchens located in public use areas.<sup>30</sup>

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

The Project's infill location will promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation will reduce vehicle trips and vehicle miles traveled for residents and visitors.

#### **4.16.1 Solar Ready Roof**

The 2022 Building Energy Efficiency Standards took effect on January 1, 2023. Low-rise multi-family buildings that do not have a photovoltaic system installed shall comply with the requirements of CCR Title 24, Park 6, Section 110.10(b) through 110.10(d).

LAMC Section 99.05.211.1 (Solar Ready Buildings) states that Projects must comply with California Energy Code Section 110.10. There are 2 exceptions: Additions having less than 2,000 square feet of new roof area and alterations.

The solar zone shall be located on the roof or overhang of the building or on the roof or overhang of another structure located within 250 feet of the building or on covered parking installed with the building project, and shall have a total area no less than 15 percent of the total roof area of the building excluding any skylight area. The solar zone requirement is applicable to the entire building, including mixed occupancy.

Per Exception 4 to Section 110.10(b)1B: Low-rise and high-rise multifamily buildings with all thermostats in each dwelling unit are demand response controls that comply with Section 110.12(a), and are capable of receiving and responding to Demand Response Signals prior to granting of an occupancy permit by the enforcing agency. In addition, in each dwelling unit, comply with one of the following measures: Install a dishwasher that meets or exceeds the ENERGY STAR Program requirements with either a refrigerator that meets or exceeds the ENERGY STAR Program requirements or a whole house fan driven by an electronically

<sup>30</sup> Los Angeles Ordinance No. 187,714. <https://www.ladbs.org/services/green-building-sustainability#all-electric>

commutated motor.<sup>31</sup>

Therefore, should the Project provide smart thermostats and Energy Star rated dishwashers and refrigerators in every unit, it may be exempt from solar ready roofs per CBC Title 24 Energy Code Exception 4.

## 4.17 Anticipated Construction Schedule

The estimated construction schedule is shown in **Table 3-12, Construction Schedule**. This information has been provided by the Applicant and reflects Site- and Project-specific assessments of anticipated construction phase lengths and equipment to be utilized.

The Project's estimated operational year is 2027.<sup>32</sup> Construction is proposed to finish in 2027 and the Project will undergo a standard process to obtain its certification of occupancy and will begin leasing. The operational year relates to future traffic operations and assumes a fully leased building for maximum trip and VMT purposes.

The Site is vacant of all structures and contains 6,000 square feet of asphalt that will be demolished and removed.

Construction staging will be onsite with worker parking throughout construction.

For a conservative assumption, the Project will excavate at a depth of up to 62 feet for the subterranean level, foundation elements, and grading of soils for the worse-case under the descending slope in the northeast corner of the Site.<sup>33</sup>

No fill will be imported to the Site.

The amount of excavated earth materials exported will be up to approximately 40,000 cubic yards (which includes a swell expansion potential).<sup>34</sup> The Project will utilize 10 cubic yard double-bottom or end dump trucks.

The Site is in a Special Grading Area and an LADBS Haul Route Approval is required in connection with the export of more than 1,000 cubic yards of earth materials. Truck routes for export are expected to utilize the most convenient access to freeway ramps, and will comply with the LADBS-approved route.

The truck route will be approximately 20 miles one-way, or 40 miles roundtrip, and is anticipated to include the following:

<sup>31</sup> CEC, 2019 Building Energy Efficiency Standards, Section 110.10: <https://energycodeace.com/site/custom/public/reference-ace-2019/index.html#IDocuments/section11010mandatoryrequirementsforsolarreadybuildings.htm>

<sup>32</sup> Estimates provided by the Applicant, May 2023.

<sup>33</sup> Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

<sup>34</sup> Estimates provided by the Applicant, May 2023.

- Full trucks: Exit Site and go east on Sunset Boulevard, south on Beaudry Avenue, east on Temple Street, US-101 East, to I-10 East, to I-605 North (San Gabriel River Freeway), to Arrow Highway to Nu Way Landfill destination at 1270 Arrow Highway, Irwindale, 91706.
- Empty trucks will travel in the reverse route to the Site.

**Table 3-12  
Construction Schedule**

<b>Phase</b>	<b>Schedule</b>	<b>Duration</b>
Demolition of asphalt	December 24, 2024 – December 31, 2024	1 week
Site Preparation	January 1, 2025 – January 15, 2025	2 weeks
Grading	January 16, 2025 – April 30, 2025	4 months
Trenching	May 1, 2025 – May 31, 2025	1 month
Construction	June 1, 2025 – May 31, 2027	24 months
Architectural Coatings	April 1, 2027 – June 30, 2027	3 months
<b>Total</b>	<b>December 24, 2024 – June 30, 2027</b>	<b>30 months</b>

Demolition involves removing buildings or structures.

Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.

Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.

Building Construction involves the construction of the foundation, structures, and buildings.)

Trenching is associated with underground utilities, including gas, water, electricity, telecommunications.

Paving involves the laying of concrete or asphalt such as in parking lots, roads, driveways, or sidewalks.

Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

Construction schedule, including start, end, and duration dates are estimates only.

Some overlap of phasing may occur.

The analysis assumes that construction will start in late 2024. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years will be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Estimates provided by the Applicant, May 2023.

## 4.18 Discretionary Requests

Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following:<sup>35</sup>

- 1) **Density Bonus Compliance Review (DB)**, pursuant to LAMC Section 12.22 A.25(g)(3), for a Project having 327 residential dwelling units, including 41 units reserved for Very Low Income households, with the following On and Off-Menu Incentives:
  - a) **On Menu Incentive**, for an increase in the Floor Area Ratio (FAR) to 3.0:1 in lieu

<sup>35</sup> [Attachment A Findings](#), Applicant, March 4, 2024.

of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone.

- b) **Off-Menu Incentive**, for a 30% reduction in open space to allow 24,540 in lieu of the otherwise required 35,050 square feet.
- c) **Off Menu Incentive**, for additional height and stories:
  - for Building A, for a 34-foot height increase for a height of 91 feet as measured from grade, (57 feet plus 34 feet) and an 85-foot height as measured from Plumb Height (45 feet plus 40 feet) and seven stories in lieu of the otherwise allowed three stories; and
  - for Building B, for a 29-foot height increase for a height of 86 feet as measured from grade (57 feet plus 29 feet) and an 81.5-foot height as measured from Plumb Height (45 feet plus 36.5 feet) and seven stories in lieu of the otherwise allowed three stories.
- 2) **Site Plan Review (SPR)** pursuant to LAMC Section 16.05, for a development project that results in an increase of 50 or more dwelling units and/or guest rooms.
- 3) **Main Conditional Use Permit (MCUB)**, pursuant to LAMC Section 12.24.W.1 of Chapter 1 and LAMC Section 13.B.2.2 of Chapter 1A, to allow the sale and dispensing of a full line of alcoholic beverages for on-site and off-site consumption, in conjunction with a total of 9,462 square feet of potential indoor and outdoor restaurant space for up to five establishments with up to 300 indoor seats, and 75 outdoor seats, for a total of up to 375 patrons.
- 4) Approval of a **Haul Route** for a project located within a Special Grading Area with greater than 1,000 cubic yards of export.

As required by various sections of the LAMC, the Applicant will obtain the necessary administrative approvals and permits from the Building and Safety Department and other municipal agencies for Project construction actions, including but not limited to the following: demolition, excavation, shoring, grading, foundation, building, street tree removal (if applicable), and tenant improvements.

## 5 Responsible Public Agencies

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

# Section 4

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## SCEA Criteria and Consistency Analysis

### 1 Transit Priority Project Criteria

Senate Bill (SB) 375 provides CEQA streamlining benefits to qualifying Transit Priority Projects (TPPs). Section 21155(b) of the Public Resources Code defines a TPP for SCEA purposes as a project that meets the following three criteria:

1. Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75);
2. Provides a minimum net density of at least 20 dwelling units per acre; and
3. Is located within one-half mile of a “major transit stop” or “high-quality transit corridor” included in the 2020–2045 RTP/SCS

**Consistency with Criterion #1: Contains at least 50 percent residential use, based on total building square footage (and if the project contains between 26 and 50 percent of non-residential uses, a floor area ratio of not less than 0.75)**

The Project would construct a new mixed-use building totaling 321,300 square feet, including 311,838 square feet of residential uses and 9,462 square feet of ground-floor commercial space. The Project’s residential floor area would comprise approximately 98 percent of the Projects’ new building square footage.

Thus, the Project would contain at least 50 percent residential use based on total building square footage and would be consistent with Criterion #1.

**Consistency with Criterion #2: Provides a minimum net density of at least 20 units per acre.**

The Project proposes 327 dwelling units on a 2.459-acre (107,100-square-foot) site, resulting in an overall net residential density of 133 units per acre.

Thus, the Project would provide a minimum net density of at least 20 units per acre and would be consistent with Criterion #2.

**Consistency with Criterion #3: Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.**

A major transit stop is defined in PRC Section 21064.3 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.” Furthermore, pursuant to PRC Section 21155(b), it also includes major transit stops that are included in the applicable regional transportation plan.

A high-quality transit corridor is defined in PRC Section 21155(b) as “[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.” The City of Los Angeles defines peak hours as between 6:00 AM and 9:00 AM and between 3:00 PM and 7:00 PM.

As shown by **Table 3-1** in Section 3, Project Description, of this SCEA, the Site is served by several bus lines operated by Metro and LADOT, including several lines with a 15 minute or less service frequency during peak commute hours and that intersect at Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street, located 2,075 feet southeast of the Site. Specifically, at this intersection, Metro bus line 4 provides east-west service every 7.5 minutes, Metro bus line 55 provides north-south service every 12-15 minutes, and Metro bus line 60 provides east-west service every 5-8 minutes.

Accordingly, Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street both meet the statutory definition of a high quality transit corridor and the intersection qualifies as a major transit stop.

Thus, the Project is consistent with Criterion #3 due to its location within one-half mile of both a high quality transit corridor and a major transit stop.

## 2 Consistency With a Sustainable Communities Strategy

SB 375 provides CEQA streamlining benefits to qualifying TPPs which demonstrate consistency with a Sustainable Communities Strategy (SCS), which, if implemented, would achieve the State’s greenhouse gas (GHG) reduction targets. For purposes of projects in the SCAG region, a qualifying TPP must demonstrate consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), given the California Air Resources Board’s (CARB’s) acceptance of SCAG’s determination dated October 30, 2020 that the 2020–2045 RTP/SCS would, if implemented, achieve the GHG emission reduction targets for year 2035.

The 2020–2045 RTP/SCS presents strategies and measures that are consistent with local jurisdictions’ land use policies and incorporates best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). It is important to note, however, that SCAG does not have a direct role in implementing the SCS through decisions about what type of development goes where. The role of the 2020–2045 RTP/SCS in guiding growth is explained in more detail in *Chapter 3, A Path to Greater Access, Mobility, and Sustainability*, of the 2020–2045 RTP/SCS.

### 2.1 Use Designation, Density, and Building Intensity

The 2020–2045 RTP/SCS incorporates center focused placemaking as a land use tool to create dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG emissions. This approach supports attractive and

functional places for residents of the region to live, work, and play, with priority placed on urban and suburban infill sites in existing/planned service areas. These centers are typically human-scale, compact, and pedestrian oriented with a variety of housing types and affordability options.

To facilitate focused placemaking, the 2020–2045 RTP/SCS identifies Priority Growth Areas (PGAs) across the SCAG region. PGAs are locations where many of the 2020–2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas (TPAs), High Quality Transit Areas (HQTAs), Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence (SOIs). According to the 2020–2045 RTP/SCS, PGAs account for only 4 percent of the region’s total land area, but implementation of SCAG’s recommended growth strategies will help these areas accommodate 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. The more compact form of regional development implemented through PGAs, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the regional resources areas. PGAs do not limit any particular development project from being built in any particular location.

However, they are intended to guide general growth patterns, which the City of Los Angeles accomplishes through its General Plan and Community Plans. In addition, while the 2020–2045 RTP/SCS does not require individual TPPs to be located within PGAs, the expectation is that most of the more intensive development in the region would be within one or more PGAs. The PGAs are shown in Exhibit 3.4 through Exhibit 3.10 of the 2020–2045 RTP/SCS.

The Project’s location relative to each of the PGAs is shown in **Figure 4-1** to **Figure 4-7** of this SCEA. As show, the Project Site is located adjacent to a Job Center; within a TPA, an HQTA and an NMA; and along a Livable Corridor, as described below:

- **Job Centers:** Job Centers are where regional strategies that support economic prosperity can be deployed in catalytic ways. Job Centers have been identified in all six counties in the SCAG region and represent areas that have a significantly higher employment density than surrounding areas. Job Centers represent areas with local employment peaks rather than simply places with the most jobs. Identified Job Centers are present in over 60 percent of the region’s cities and contain about one-third of Southern California’s jobs – but only cover less than 1 percent of the region’s land area. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.

The Project Site is located adjacent to the Downtown Los Angeles Job Center.<sup>1</sup>

- **Transit Priority Areas:** TPAs are Priority Growth Areas that are within one half mile of existing or planned ‘major’ transit stops in the region. A ‘major’ transit stop is defined as a site containing an existing or planned rail or bus rapid 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. TPAs are where people can live, work and play in higher density, compact

<sup>1</sup> SCAG, Job Centers: [https://gisdata-scag.opendata.arcgis.com/datasets/234ba3f5ac4c400ea1961d45f35db06f\\_0/explore?location=34.067542%2C-118.249605%2C17.00](https://gisdata-scag.opendata.arcgis.com/datasets/234ba3f5ac4c400ea1961d45f35db06f_0/explore?location=34.067542%2C-118.249605%2C17.00), accessed August 25, 2023.

communities with ready access to a multitude of safe and convenient transportation alternatives.

The Project Site is located within a TPA due to its proximity to the intersection of intersection of Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street, 2,075 feet southeast of the Site, which is served by Metro bus lines 4, 55, and 60. These lines have headways of 15 minutes or less during peak hours.<sup>2</sup>

- **High Quality Transit Areas:** HQTAs are corridor-focused PGAs within one-half mile of an existing or planned fixed transit stop or bus transit corridor where buses operate at a frequency of at least every 15 minutes during peak commute hours. HQTAs represent under 3 percent of the region’s acreage but are projected to be home to over 51 percent of new households between 2016 and 2045. New developments within HQTAs should respond to the existing physical conditions of the surrounding area, preserving existing development patterns and neighborhood character while providing a balance of modal and housing choices.

The Project Site is located within a HQTA due to its proximity to the intersection of Sunset Boulevard which has transit routes with a 15 minute or less service frequency during peak commute hours.<sup>3</sup>

- **Neighborhood Mobility Areas:** NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds, with a focus on creating, improving, restoring, and enhancing safe and convenient connections to a variety of land uses (e.g., schools, shopping, services, places of worship, parks, and greenways). Safer and shorter multimodal trips are encouraged to reduce the reliance on single occupancy vehicles. This is achieved in NMAs through increased density, mixed land uses, neighborhood design, enhanced destination accessibility, and reduced distance to transit.

The Project Site is located within a mapped NMA.<sup>4</sup>

- **Livable Corridors:** Livable Corridors strategy encourages increased density at nodes along key corridors. This strategy focuses on transit improvements, which include dedicated or semi-dedicated bus lanes, enhanced bus shelters, real-time travel information, and off-bus ticketing; active transportation improvements, which would support safe bicycling and walking; and land use policies, which includes developing mixed-use retail centers at key nodes and increasing neighborhood-oriented retail at intersections.

The nearest Livable Corridor to the Project Site is Sunset Boulevard, located adjacent west of the Project Site.<sup>5</sup>

2 SCAG, TPA, [https://gisdata-scag.opendata.arcgis.com/datasets/d1be0e8e35f94522bf37132f5454f42c\\_0/explore](https://gisdata-scag.opendata.arcgis.com/datasets/d1be0e8e35f94522bf37132f5454f42c_0/explore), accessed August 25, 2023.

3 SCAG, HQTA, <https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::high-quality-transit-areas-hqta-2045-scag-region/explore>, accessed August 25, 2023.

4 SCAG, NMA, [https://gisdata-scag.opendata.arcgis.com/datasets/b7f33b2a8f6c43de937f17ab14f2d4\\_0/explore](https://gisdata-scag.opendata.arcgis.com/datasets/b7f33b2a8f6c43de937f17ab14f2d4_0/explore), accessed August 25, 2023.

5 SCAG, Livable Corridors, <https://gisdata-scag.opendata.arcgis.com/datasets/SCAG::livable-corridors-scag-region/explore>, accessed August 25, 2023

The Project's location, scale, and mixture of land uses would be consistent with its designation within these four PGAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the SCS. Specifically, the Project Site is located in an urbanized area within the Silver Lake-Echo Park-Elysian Valley Community Plan Area of the City.

The Project would respond to and complement the existing development pattern in the area, which is characterized by a mix of low-to mid-rise buildings containing commercial and residential uses. The Project includes the construction of a new 321,300-square-foot mixed-use development comprised of 327 residential and live-work units (inclusive of 41 units reserved for Very Low-Income Households) and 9,462 square feet of ground-floor commercial space on a site that is well-served by transit.

As noted above, the Project is approximately 97 percent residential, with the residential component of the Project consisting of 13 studio units, 230 1-bedroom units, 79 2-bedroom units, and 5 3-bedroom units. Six of the units on the ground floor along Sunset Boulevard in Building A would be live/work, thereby providing additional diversity of housing types. The Project would contain a total of 321,300 square feet with a FAR of 3:1.

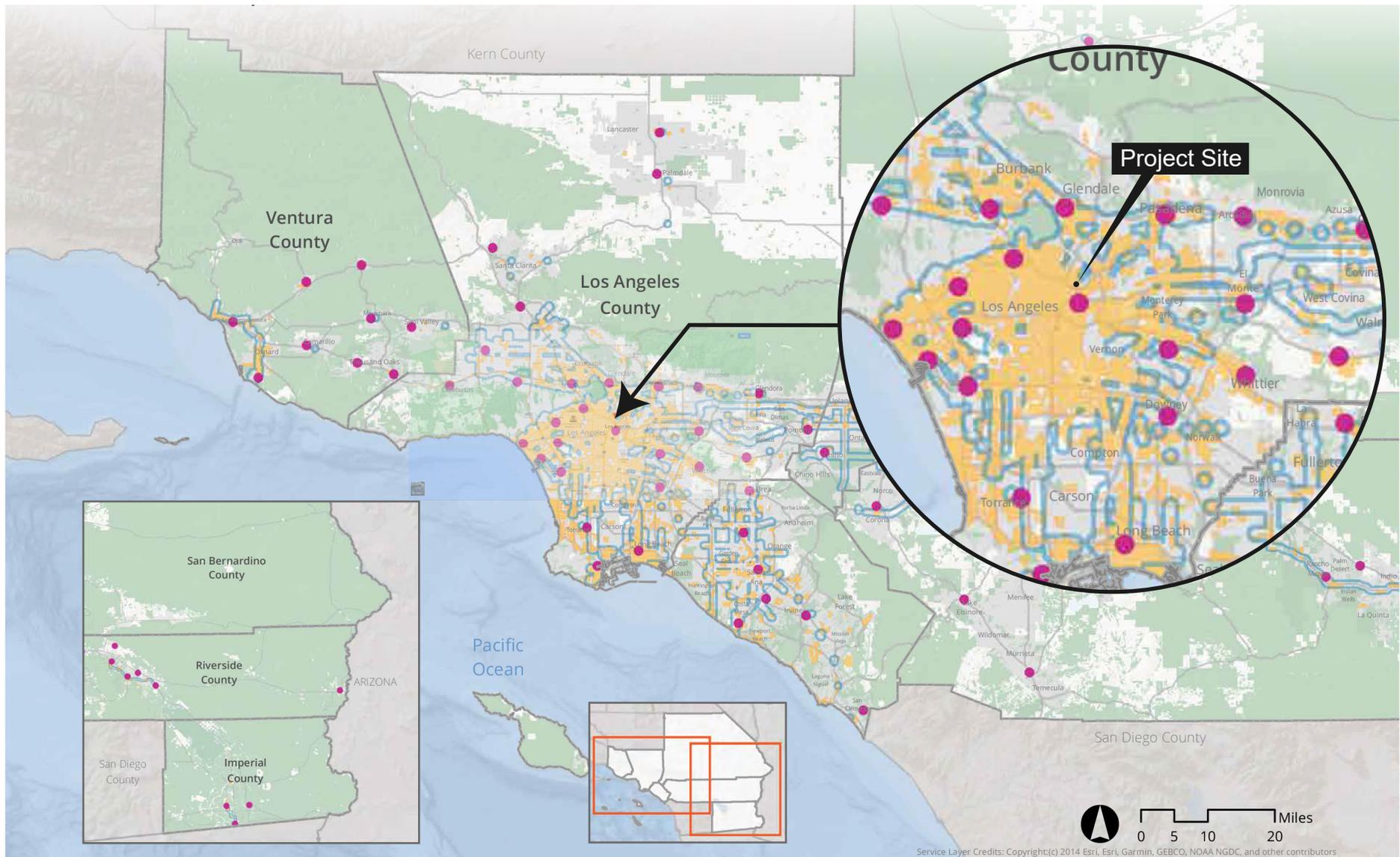
The Project would significantly increase the housing supply in the Project area, as well as housing diversity and affordability in the PGAs in which the Project Site is located. The Project Site is located near several bus lines, including Metro bus lines 4, 55, and 60, which provide peak commute hour headways of 15 minutes or less, thereby providing nearby high-frequency and high-quality transit options.

Thus, the mixed-use nature of the Project in an urban area near transit would provide opportunities for Project residents, visitors, and employees to have safer and shorter multimodal trips, thereby reducing dependency on automobile travel and single occupancy trips and thus, reducing GHG emissions.

The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 24,540 square feet.

In addition, the Project would provide 183 bicycle parking spaces (including 162 long-term spaces and 21 short-term spaces). Pedestrian-scaled design and pedestrian and bicycle amenities would encourage the use of alternative modes of travel, thereby further reducing reliance on automobile travel and resulting GHG emissions.

Overall, the nature of the Project, including the location, mix of uses, density, and building intensity, would be consistent with SCAG's land use strategies related to reducing dependence on automobile travel and thus, mobile-source GHG emissions, by encouraging development within PGAs. Furthermore, the Project would be consistent with the intent of the specific PGAs in which it is located (i.e., TPA, HQT, NMA, and Livable Corridor). As such, the Project would be consistent with the 2020–2045 RTP/SCS's goals, policies and benefits for land use, density, and intensity of development.



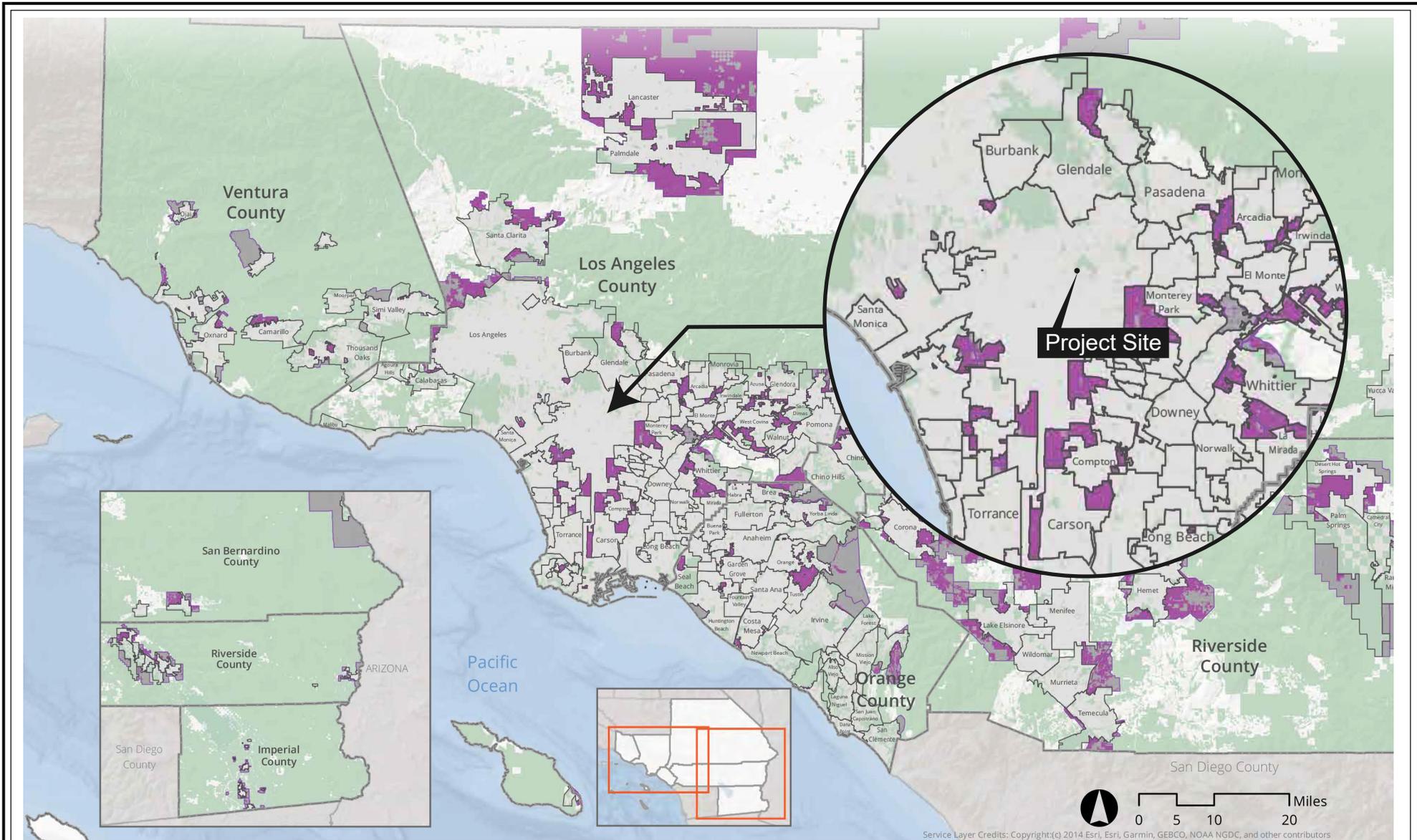
Priority Growth Areas vs. Regional Growth Constraints

- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Note: SCAG used locally informed data elements to determine Regional Growth Constraints such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details.

Figure 4-1  
Priority Growth Areas & Growth Constraints

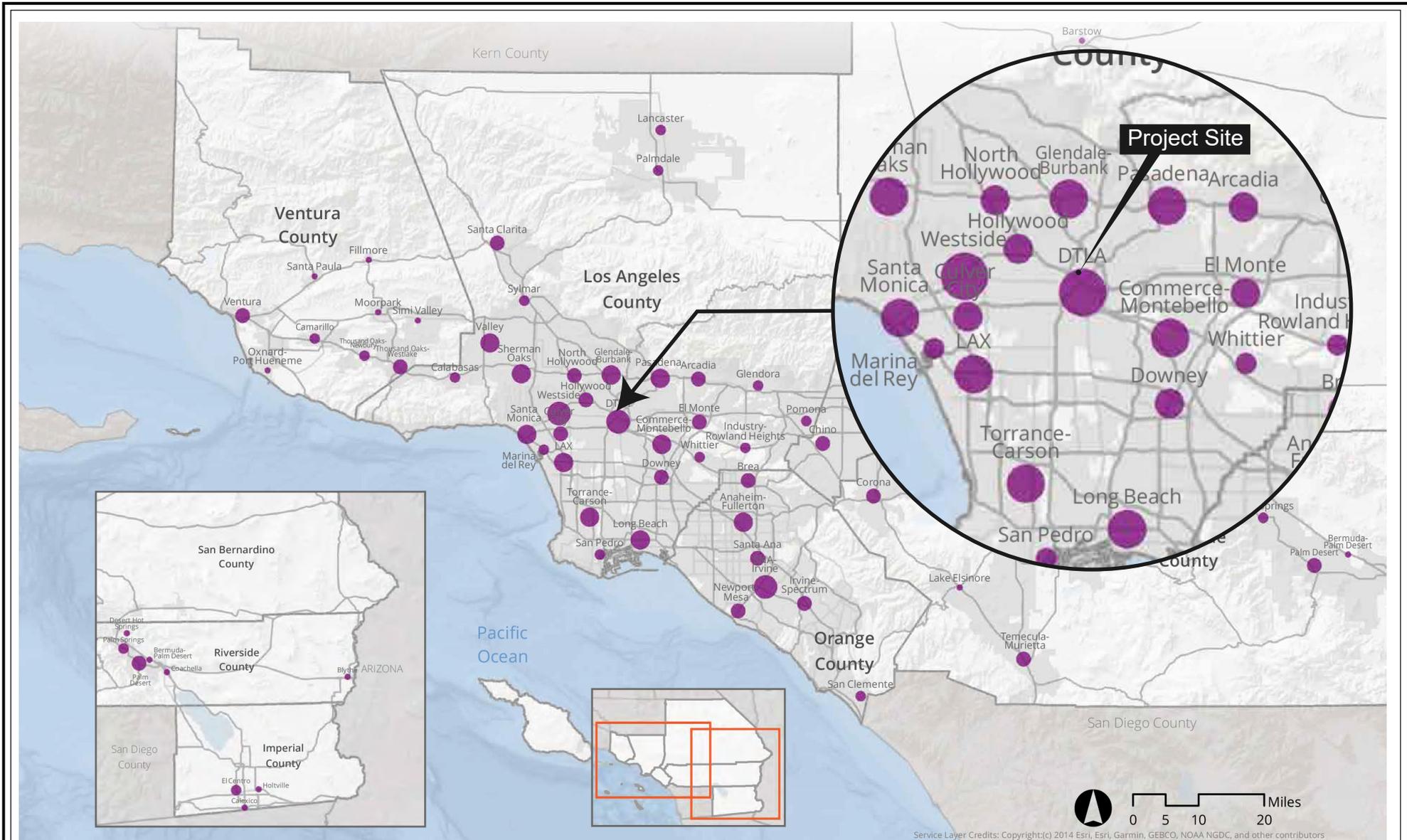


- County Boundaries
- Sphere of Influence
- City Boundaries
- Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details.

Source: Counties and local jurisdictions LAFCO in SCAG region, 2018

Figure 4-2  
Priority Growth Areas - Spheres of Influence



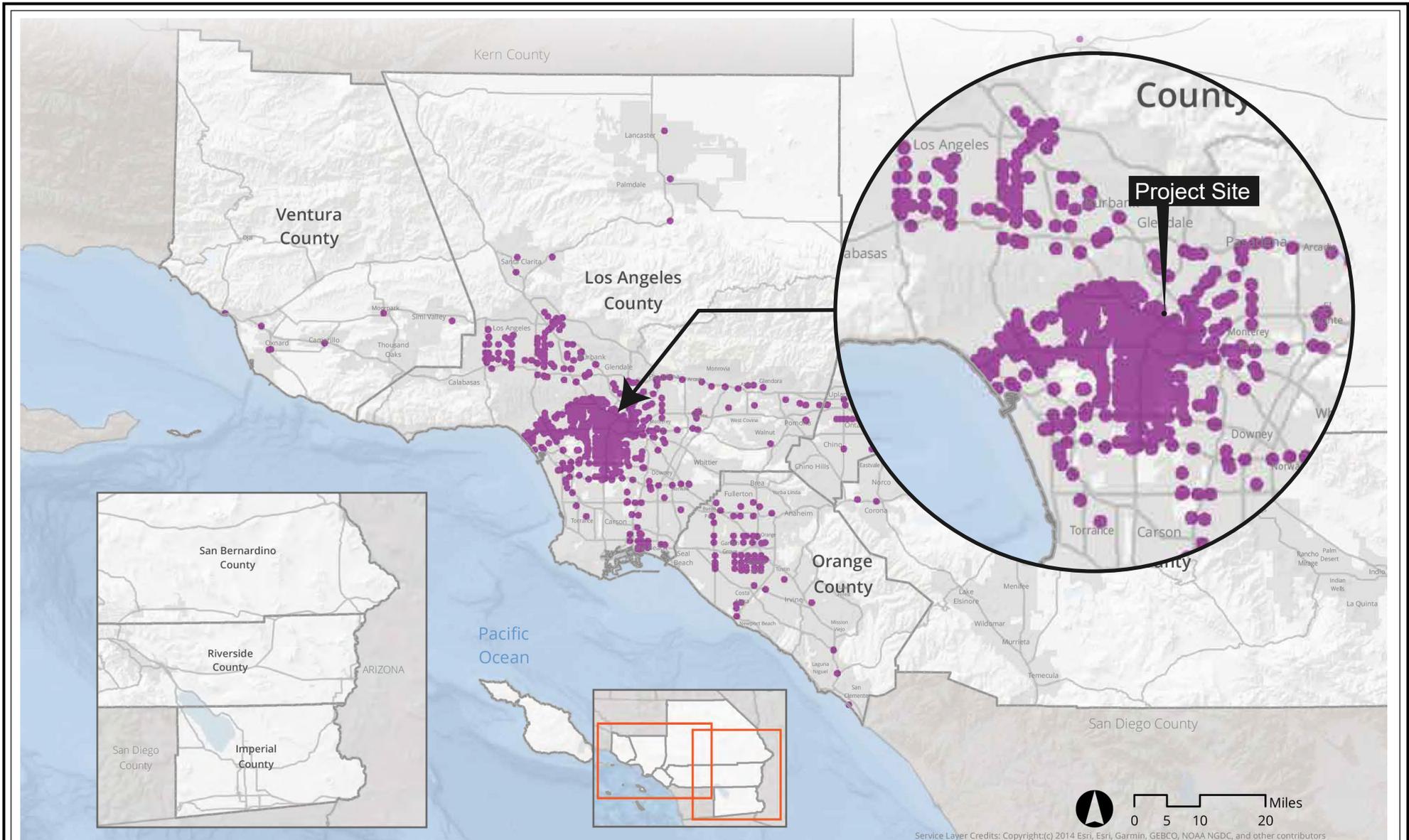
**SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)**

- Less than 10,001 (17)
- 10,001 - 25,000 (22)
- 25,001 - 50,000 (19)
- 50,001 - 150,000 (11)
- More than 150,000 (3)

Source: SCAG, 2019

**Notes:**

- (1) Centers are areas with denser employment than their surroundings.
- (2) Dots represent the total employment in each center, not center boundaries.
- (3) Names are intended to be illustrative and may not reflect all the jurisdictions in which a center fully lies.

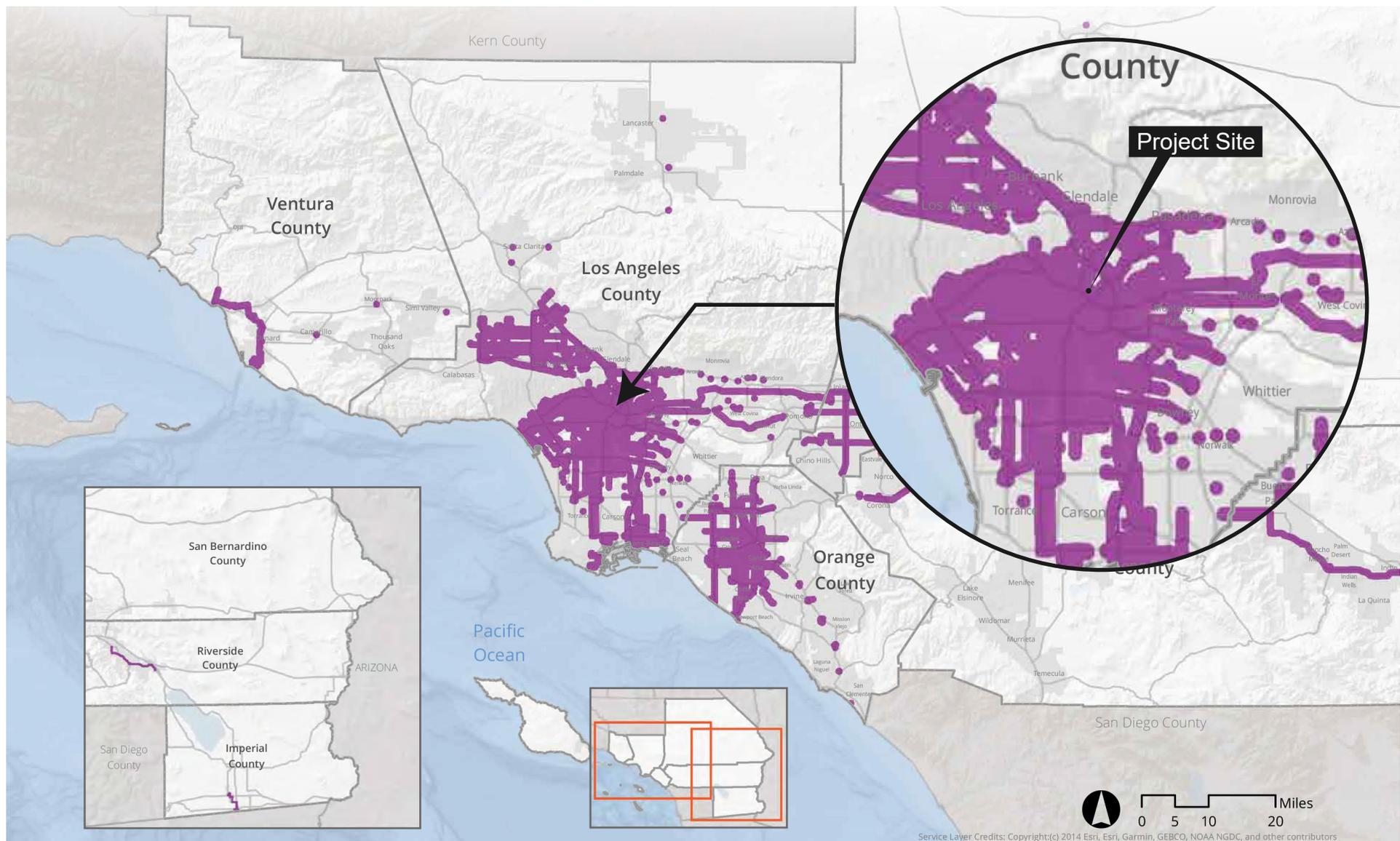


Transit Priority Areas (2045)

■ TPA

Source: County Transportation Commissions, SCAG, 2019

Note: Transit priority area (TPA) refers to an area within one-half mile of a major transit stop that is existing or planned. SCAG identifies major transit stops and transit priority areas using the methodology described in the Transit Technical Report. Major transit stops are extracted from 2045 plan year data of Connect SoCal.

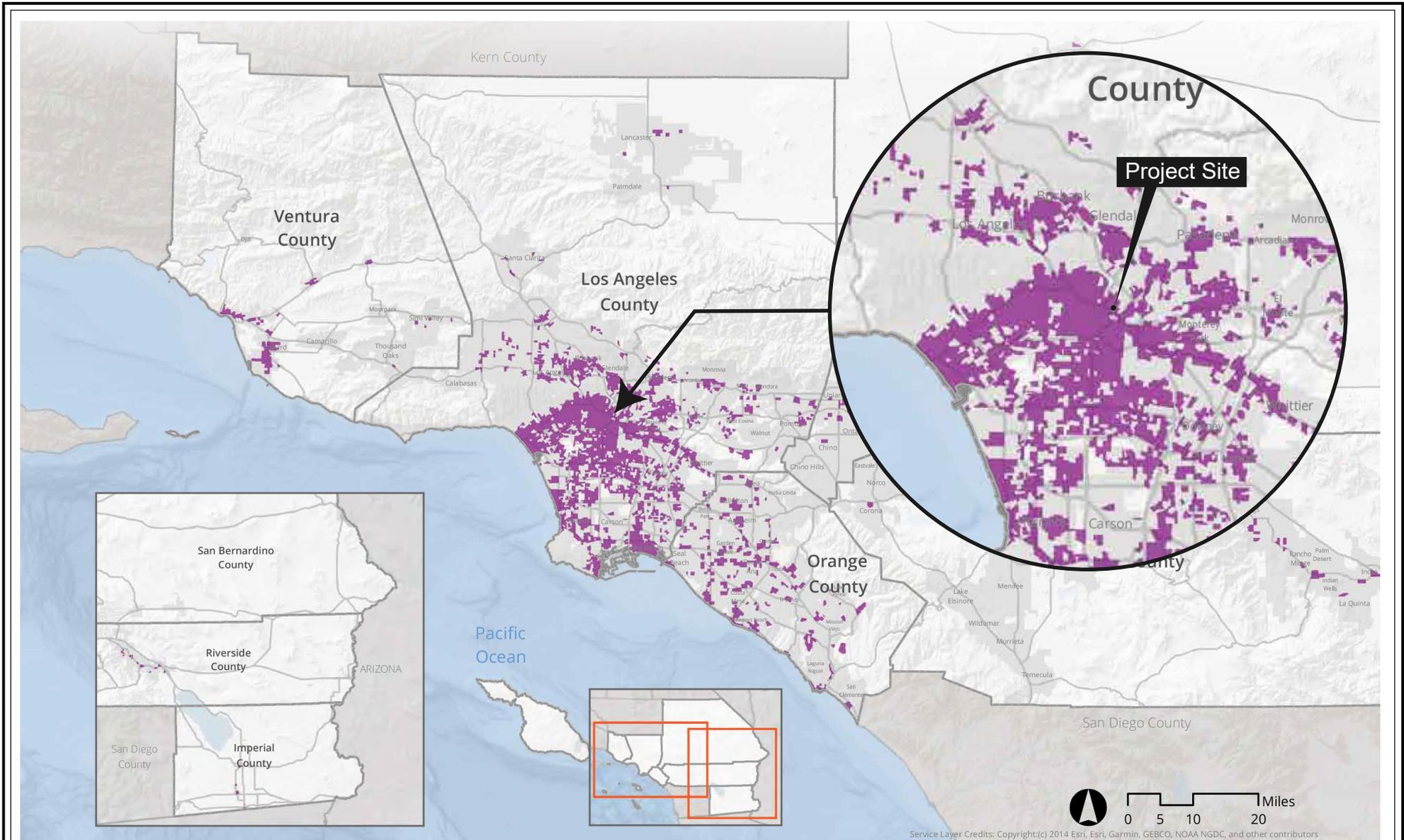


High Quality Transit Areas (2045)

■ HQTA

Source: County Transportation Commissions, SCAG, 2019

Note: SCAG's High Quality Transit Area (HQTA) is within one-half mile from major transit stops and high quality transit corridors (HQTC). SCAG identifies major transit stops and HQTAs using the methodology described in the Transit Technical Report. Major transit stops and HQTAs are extracted from 2045 plan year data of Connect SoCal.

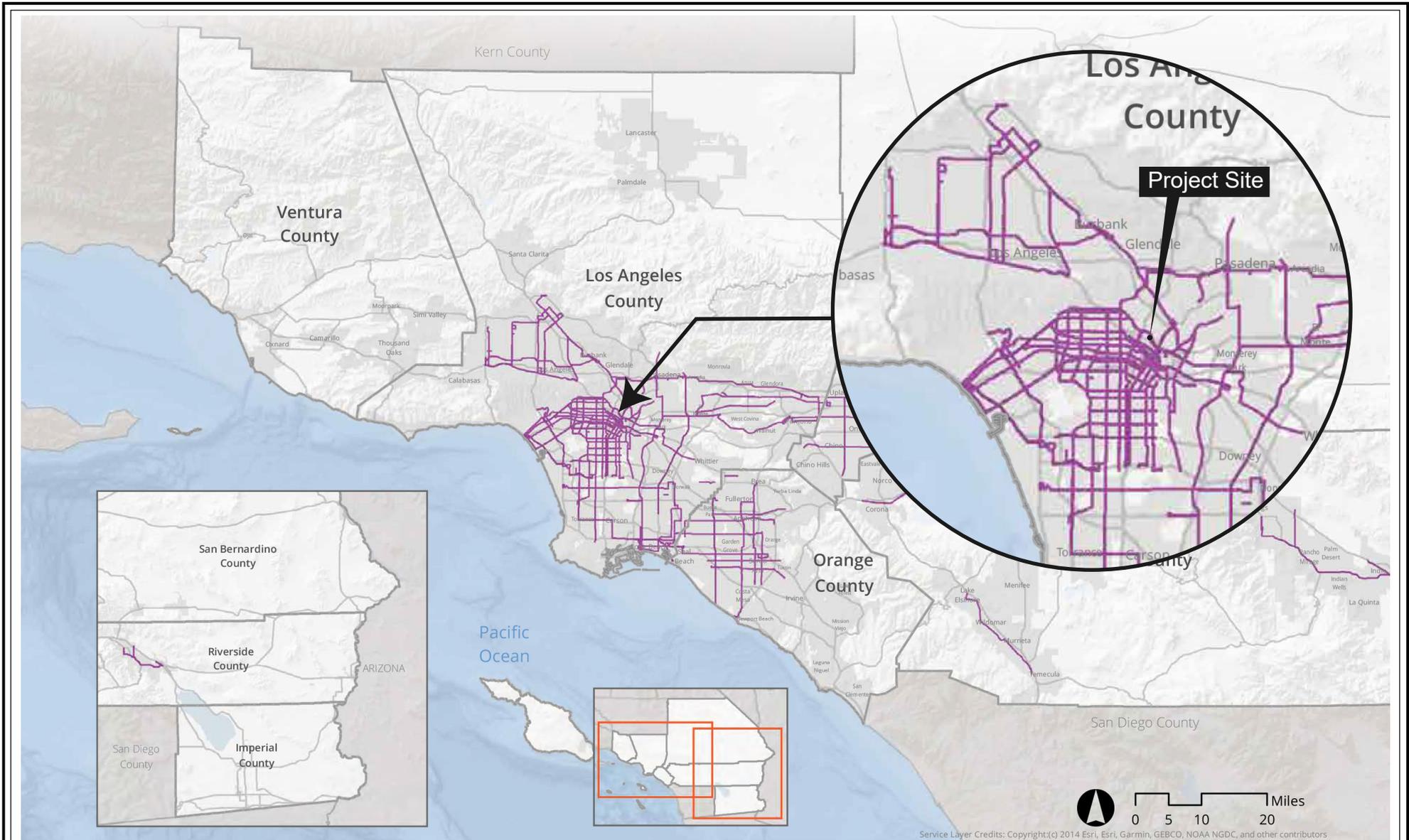


Neighborhood Mobility Areas (NMA)

■ NMA

Source: SCAG, 2019

Note: Neighborhood Mobility Areas (NMA) were identified by analyzing and assigning z-scores four measures at the Tier 2 TAZ level, and subsequently summing the z-scores. TAZs that scored at the 80th percentile or higher for the composite score were considered NMAs.



Livable Corridors

— Livable Corridors

Source: SCAG, 2019

Source: Connect SoCal, July 2023.

Figure 4-7  
Priority Growth Area - Livable Corridors

## 2.2 Sustainable Communities Strategy Policy Consistency

Chapter 3 of the 2020–2045 RTP/SCS outlines strategies and measures included in the SCS Technical Report that are intended to be supportive of implementing the regional SCS. Several of these strategies and measures are directly tied to supporting related GHG reductions while others support the broader goals of the 2020–2045 RTP/SCS.

As discussed in **Table 4-1** and **Table 4-2**, the Project would be consistent with the applicable goals and guiding principles and strategies, respectively, of SCAG’s 2020-2045 RTP/SCS.

**Table 4-1**  
**Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
<p><b>Goal 1</b> Encourage regional economic prosperity and global competitiveness.</p>	<p><b>Not Applicable.</b> This goal is directed towards SCAG and the City and does not apply to the Project.</p> <p>However, the Project would construct housing and neighborhood-serving commercial restaurant uses near other residential, commercial, office, and cultural uses in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California by providing housing and commercial uses.</p> <p>The Project is also siting market rate and affordable housing adjacent to an identified RTP/SCS Job Center.</p>
<p><b>Goal 2</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.</p>	<p><b>Consistent.</b> The Project Site is located in a highly urbanized area of the City and would develop 327 multi-family residential units and approximately 9,462 square feet of commercial restaurant land uses within an HQTAs and along a Livable Corridor, as defined by SCAG, and within a TPA as defined by SB 743, and also in close proximity to existing and proposed residences and commercial opportunities.</p> <p>Also, the Project would ensure safe travel at and near the Project Site by ensuring safe vehicular and pedestrian access.</p> <p>In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be subject to the Site Plan Review requirements of the City and would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways.</p> <p>Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and</p>

**Table 4-1**  
**Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
	goods.
<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 would construct market rate and affordable housing and commercial uses near other commercial, office, and cultural uses and in close proximity to an identified Job Center. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment.</p> <p>In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Sunset Boulevard) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.</p> <p>Project residents and guests would have access to residential lobbies located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood.</p> <p>Finally, the Project would include approximately 162 long-term bicycle parking stalls and 21 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation.</p>
<p><b>Goal 5</b> Reduce greenhouse gas emissions and improve air quality.</p>	<p><b>Consistent.</b> The Project would construct market rate and affordable housing and commercial restaurant uses near other residential, commercial, office, and cultural uses and adjacent to a designated Job Center. Therefore, Project residents and employees would be able to walk and bike to work, shopping, and entertainment.</p> <p>In addition, the Project Site's location near robust transit opportunities (high frequency bus service along Sunset Boulevard) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.</p> <p>Project residents and guests would have access to a residential lobbies located at ground level that would provide connectivity to the pedestrian infrastructure</p>

**Table 4-1**  
**Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
	<p>adjacent to and in the vicinity of the Project Site.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood.</p> <p>Finally, the Project would include approximately 162 long-term bicycle parking stalls and 21 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation.</p>
<p><b>Goal 6</b> Support healthy and equitable communities.</p>	<p><b>Consistent.</b> The Project would construct housing, and commercial restaurant uses near other commercial, office, and cultural uses and add to housing diversity. Of the 327 proposed dwelling units, 41 of the units (15% of base density) would be set aside for rental to households qualifying at the Very Low Income level.</p> <p>Given the urban nature of the Project Site area, and location near an identified Job Center, Project residents and employees would be able to walk and bike to work, shopping, and entertainment uses.</p> <p>In addition, the Project Site's location near robust transit opportunities (including multiple high frequency bus lines along Sunset Boulevard) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.</p> <p>Project residents and guests would have access to a residential lobbies located at ground level that would provide connectivity to the pedestrian infrastructure adjacent to and in the vicinity of the Project Site.</p> <p>The provision of the ground-floor commercial restaurant use would further activate the pedestrian environment of the neighborhood.</p> <p>Finally, the Project would include approximately 162 long-term bicycle parking stalls and 21 short-term bicycle parking stalls, which would encourage bicycling as a form of transportation and exercise.</p>
<p><b>Goal 7</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p><b>Consistent.</b> The Project includes development of mixed residential (market rate and affordable) and commercial restaurant uses on an infill site in an urbanized area of the City that is near several sources of transit and an identified Job Center.</p> <p>The Project would also include approximately 162 long-term bicycle parking stalls and 21 short-term bicycle</p>

**Table 4-1**  
**Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
	<p>parking stalls.</p> <p>This type of transit-oriented mixed-use project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.</p>
<p><b>Goal 8</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.</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 9</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.</p>	<p><b>Consistent.</b> The Project includes development of 327 residential units, in addition to ground floor commercial uses. Of the 327 proposed units, 41 of the units (15% of base density) would be set aside for rental to households qualifying at the Very Low Income level.</p>
<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> Encourage RTP/SCS 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>
<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.</p>
<p><b>Guiding Principle 7</b> Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order</p>	<p><b>Not Applicable.</b> This principle is directed toward SCAG and other jurisdictions/agencies that have control over</p>

**Table 4-1**  
**Consistency with 2020-2045 RTP/SCS: Goals and Guiding Principles**

Goals and Policies	Project Consistency Assessment
to design for long term resilience.	transportation investments.
Source: 2020-2045 RTP/SCS, 2020.	

**Table 4-2**  
**Consistency with 2020-2045 RTP/SCS: Strategies/Measures**

Strategy/Measure	Consistency Assessment
<b>Strategy: Focus Growth Near Destinations and Mobility Options</b>	
Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	<b>Consistent.</b> The Project would consist of a mixed-use development that would include market-rate and affordable residential units and retail/restaurant uses within a PGA. Consistent with the Project Site's location adjacent to a Job Center, within a TPA, HQT, and NMA, and adjacent to a Livable Corridor, residents and employees of the Project would have multimodal access (e.g., transit, walking, and bicycling) to and from their jobs, school, and other destinations.
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	<b>Consistent.</b> The Project would contribute to a balance between jobs and housing in the region by providing 327 new market-rate and affordable residential dwelling units within the Silver Lake-Echo Park-Elysian Valley Community Plan Area of the City.  The Project Site is located in an urban area near commercial and job centers. Furthermore, the Project Site is served by a variety of public transit options provided by Metro bus lines 4, 55, and 60, which provide peak commute hour headways of 15 minutes or less.
Plan for growth near transit investments and support implementation of first/last mile strategies	<b>Consistent.</b> As discussed above, the Project Site is served by a variety of public transit options, including Metro bus lines 4, 55, and 60. Thus, the Project would provide for growth near transit investment.  First/last mile strategies are designed to increase transit usage by making it more convenient and safer to walk or bicycle to and from transit stations. The Project would promote first/last mile infrastructure by providing 183 bicycle parking spaces (21 short-term and 162 long-term), easy bicycle accessibility to the Project Site to encourage alternative mobility for employees and visitors to the Project Site.
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	<b>Consistent.</b> While this measure is directed toward public agencies, the Project would support its implementation. The Project would replace a vacant site with a new mixed-use building with multi-family residential units and ground floor commercial uses.

Strategy/Measure	Consistency Assessment
	<p>Specifically, the Project would include the development of a new approximately 321,300-square-foot development comprised of 327 residential apartment units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space. The Project would be designed to complement adjacent uses and enhance the surrounding area, creating an inviting atmosphere.</p>
<p>Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods</p>	<p><b>Consistent.</b> The Project would replace commercial uses with a new mixed-use building with multi-family residential units and ground floor commercial uses.</p> <p>Specifically, the Project would include the development of a new approximately 321,300-square-foot building comprised of 327 residential apartment units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space.</p> <p>The Project would provide a 24,540 square feet of open space and recreational amenities in the form of private decks, a plaza, courtyards, roof decks, and indoor amenities.</p> <p>Thus, the Project would represent infill development that would accommodate growth, increase amenities, and enhance connectivity to existing neighborhoods.</p>
<p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).</p>	<p><b>Consistent.</b> The Project has been designed to incorporate a variety of strategies that would reduce the reliance on, and number of, solo car trips.</p> <p>The Project would include a mix of uses, including 327 residential apartment units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space that would be located in an area that is well-served by transit and that has been identified as a PGA.</p> <p>The Project would be designed at a pedestrian scale and would incorporate amenities and improvements, including a plaza on the southern end of the Project Site at Sunset Boulevard and Everett Street.</p> <p>In addition, the Project would provide 183 bicycle parking spaces (162 long-term spaces and 21 short-term spaces) to encourage bicycling and walking for residents, employees, and visitors to the Project Site.</p> <p>Furthermore, the Project would expand residential and employment opportunities in proximity of residential and commercial areas, destinations, and other neighborhood services in a diverse urban area.</p>

Strategy/Measure	Consistency Assessment
<b>Strategy: Promote Diverse Housing Choices</b>	
Preserve and rehabilitate affordable housing and prevent displacement.	<b>Consistent.</b> The Project Site is vacant. Thus, the Project would not displace any housing. Rather, the Project would develop 327 residential and live-work units (inclusive of 41 Very Low-Income Households).
Identify funding opportunities for new workforce and affordable housing development.	<b>Consistent.</b> While this measure is directed toward public agencies, the Project would support its implementation by including 41 Very-Low Income units as well as live-work units. In addition, the Project would include 9,462 square feet of commercial space, which would generate new employment opportunities.
Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply	<b>Not Applicable.</b> This measure is directed toward public agencies. However, the Project would increase the housing supply by providing 327 new market-rate and affordable multi-family residential units.
Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	<p><b>Consistent.</b> This measure is directed toward public agencies and does not apply to individual projects. However, the Project would support the reduction of GHG emissions by concentrating new residential development on an infill site with access to transit. In addition, the provision of pedestrian features and bicycle amenities would further expand multimodal transportation options, thereby reducing VMT and resulting GHG emissions.</p> <p>Additional sustainability features that would reduce GHG emissions would be incorporated into the Project, including but not limited to, parking spaces with electric vehicle charging equipment, lighting that meets current Title 24 Energy Standards, photovoltaic system ready, highly efficient HVAC systems, energy-efficient wall insulation and glazing units, WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and drought-tolerant planting. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable.</p>
<b>Strategy: Leverage Technology Innovations</b>	
Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space	<b>Consistent.</b> The Project would utilize low-emission technologies, including dedicated parking spaces with electric vehicle charging equipment consistent with CalGreen and LA Green Building Code requirements.
Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments	<b>Not Applicable.</b> This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.

Strategy/Measure	Consistency Assessment
Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation	<b>Not Applicable.</b> This measure is directed toward public agencies as a policy strategy and does not apply to individual projects.
<b>Strategy: Support Implementation of Sustainability Policies</b>	
Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions	<b>Consistent.</b> While this measure is directed toward public agencies, the Project would support its implementation. The Project would include a variety of sustainability measures that would reduce GHG emissions. These measures would include, but not be limited to, high efficiency plumbing fixtures and weather-based controller and drip irrigation systems, Energy Star-labeled appliances, and water-efficient landscape design. Additionally, the Project would utilize sustainable planning and building strategies and would use environmentally friendly materials where applicable.
Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations	<b>Consistent.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. However, the Project would support its implementation. The Project would be located within an HQT, TPA, and NMA and adjacent to a Livable Corridor, which both have transit routes with a 15 minute or less service frequency during peak commute hours.
Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Continue to support long range planning efforts by local jurisdictions	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.

Strategy/Measure	Consistency Assessment
<b>Strategy: Promote a Green Region</b>	
Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects.
Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration	<b>Consistent.</b> While this measure is directed toward SCAG and/or local jurisdictions as a policy strategy and does not apply to individual projects, the Project would support its implementation. With regard to urban heat islands, the Project would include extensive landscaping, thereby reducing the potential for urban heat islands.
Integrate local food production into the regional landscape	<b>Not Applicable.</b> This measure is directed toward SCAG as a policy strategy and does not apply to individual projects. Furthermore, the Project area is an urbanized area and the Project Site is not zoned, or suitable for, agricultural uses
Promote more resource efficient development focused on conservation, recycling and reclamation.	<p><b>Consistent.</b> The Project is an infill development located in an urbanized area that is served by existing infrastructure. Thus, the Project would not result in the loss of previously undeveloped land or land intended for conservation.</p> <p>Furthermore, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris.</p> <p>In addition, in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), the Project would provide a designated recycling area for Project residents and visitors. Thus, the Project would promote resource efficient development.</p>
Preserve, enhance, and restore regional wildlife connectivity.	<b>Not Applicable.</b> This measure is directed toward public agencies. Furthermore, the Project Site does not serve as a regional wildlife connector, and the Project would not interfere with wildlife corridors.
Reduce consumption of resource areas, including agricultural land.	<p><b>Consistent.</b> The Project would be developed on a site that is vacant.</p> <p>The Project Site is zoned C2-1VL. No resource areas or agricultural lands would be impacted by the Project.</p>
Identify ways to improve access to public park space	<b>Not Applicable.</b> This measure is directed toward public agencies. The Project would add housing to a vacant Site and its future residents could access nearby parks, especially by transit or bicycle.
Source: SCAG, 2020–2045 RTP/SCS, September 2020.	

# Section 5

## Evaluation of Environmental Impacts

### 1 Scope Of Analysis

This section of the Sustainable Communities Environmental Assessment (SCEA) contains an assessment and discussion of impacts associated with issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines [California Code of Regulations Title 14, Chapter 3, 15000-15387]). Pursuant to Public Resources Code (PRC) Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the Project, other than those that do not need to be reviewed pursuant to PRC Section 21159.28 based on substantial evidence in light of the whole record.

As previously discussed, the Southern California Association of Governments (SCAG) is the metropolitan planning organization for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). A Program Environmental Impact Report (PEIR) was prepared to evaluate the potential environmental impacts of SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).<sup>1</sup> As part of that PEIR, mitigation measures were included that would reduce potentially significant impacts identified in the PEIR. The complete list of the mitigation measures identified in the PEIR is included in Exhibit A, Revised Mitigation Monitoring and Reporting Program (MMRP), of the Final PEIR. The mitigation measures in the PEIR are divided into two categories: SCAG mitigation measures (referred to in the MMRP as SMM) and project-level mitigation measures (referred to in the MMRP as PMM). SCAG mitigation measures (SMMs) are intended to be implemented by SCAG over the lifetime of the RTP/SCS. Project-level mitigation measures (PMMs) are intended to be considered by lead agencies for projects proposing to streamline the environmental review process pursuant to Senate Bill (SB) 375, SB 743, or SB 226, such as the Project.

Project-level mitigation measures outlined in the PEIR should be considered and implemented by a lead agency and Project Applicant during project-specific environmental reviews, as applicable and feasible, where the lead 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 the mitigation measures identified in the PEIR 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 2020–2045 RTP/SCS PEIR 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 State CEQA Guidelines. For each mitigation measure, the City determined whether to use: (1) SCAG's MMRP 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

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<sup>1</sup> SCAG, Certified Final PEIR for the 2020–2045 RTP/SCS, May 2020.

effect. Where applicable, any mitigation measures implemented for the Project shall be identified in this section to help reduce or avoid all potentially significant impacts on the environment.

The SCEA is also required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs. Where it has been determined that a cumulative effect has been adequately addressed and mitigated, the cumulative effect shall not be treated as cumulatively considerable. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to “be guided by the standards of practicality and reasonableness.”

The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of Related Projects is based on information provided by the City of Los Angeles Department of Transportation (LADOT) and the City of Los Angeles Department of City Planning, and also includes other projects in the area based on recent studies.

The list of Related Projects within 0.5 mile of the Project Site is provided in **Table 5.21-1** and shown in **Figure 5.21-1**. Although these Related Projects serve as context for the development environment in the Project vicinity, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessment of Project impacts.

## 1.1 Aesthetics

*Senate Bill (SB) 743 [PRC Section 21099(d)] sets forth guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines a “transit priority area” (TPA) as an area within 0.5 mile of a “major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.” PRC Section 21064.3 defines “major transit stop” as “a site containing any of the following: (a) [a]n existing rail or bus rapid transit station, (b) [a] ferry terminal served by either a bus or rail transit service, or (c) [t]he 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 from, parcels that are developed with qualified urban uses.” This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.*

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

*PRC Section 21099 applies to the Project. Specifically, the Project is a mixed-use residential project located within an infill site and located less than 0.5-mile from the intersection of Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street, (2,075 feet southeast of the Site), which is served by Metro bus lines 4, 55, and 60, each of which have 15 minute or less service frequency during peak commute hours. Therefore, this intersection qualifies as a major transit stop, and the Project’s aesthetic impacts would not be considered significant impacts on the environment. The aesthetic analysis in this SCEA is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment.*

<sup>2</sup> City of Los Angeles Department of City Planning, ZI File ZA No. 2452, TPAs/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA.

	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 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?	<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"/>

**SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM AES-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.
- b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.
- c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.
- d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.
- e) Retain or replace trees bordering highways, so that clear-cutting is not evident.

- f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas.
- g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity;
- h) Use see-through safety barrier designs (e.g. railings rather than walls).

### ***Applicability to the Project***

As analyzed below, the Project would not have a substantial adverse effect on a scenic vista and, therefore, **PMM AES-1** is not applicable to the Project. However, consistent with **PMM AES-1 (g)** as well as standard industry practice, construction fencing would be installed along the perimeter of the Project Site during construction of the Project to screen construction activities from view.

**PMM AES-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable.
- b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.
- c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria.
- d) Design projects consistent with design guidelines of applicable general plans.
- e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality

of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.

- f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:
- use transparent panels to preserve views where sound walls would block views from residences;
  - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height;
  - construct sound walls of materials whose color and texture complements the surrounding landscape and development;
- g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas

### ***Applicability to the Project***

The Project is located within an urbanized area and, thus, pursuant to Aesthetics Threshold (c), the analysis included herein is focused on whether the Project would conflict with applicable zoning and other regulations governing scenic quality rather than on visual character. Thus, as **PMM AES-2** addresses visual character, it is not applicable to the Project. Notwithstanding, the Project would be consistent with a number of the design elements outlined in this mitigation measure, including minimizing contrasts in scale and massing with the surrounding area, designing the Project consistent with applicable design guidelines, and maintaining the Project Site such that blight or nuisance conditions do not occur.

**PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Use lighting fixtures that are adequately shielded to a point below the light build and reflector and that prevent unnecessary glare onto adjacent properties.
- b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances.

- c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.
- d) Use unidirectional lighting to avoid light trespass onto adjacent properties.
- e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light sensitive uses. Ongoing over the life of the plan Lead Agency Revised MMRP for the Connect SoCal Plan, Exhibit A Resolution No. 20-624-1 Impact Sciences, Inc. 4 Revised MMRP for the Connect SoCal Plan, Exhibit A 1329.001 September 2020 Mitigation Measure Mitigation Monitoring Timing Responsible Monitoring Entity
- 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.

### ***Applicability to the Project***

As analyzed below, the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Compliance with regulatory requirements would further ensure that impacts associated with light and glare would be less than significant. As such, **PMM AES-3** is not applicable to the Project. Notwithstanding, the Project would be consistent with a number of the design elements outlined in **PMM AES-3**, including use of shielded light fixtures with low reflectivity, limiting construction activities to the permitted construction hours, incorporating lighting to minimize off-site light pollution, and use of low-reflective glass.

### **Impact Analysis**

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

**No Impact.** A scenic vista is a panoramic view of a valued visual resource. Panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic views are typically associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies. Focal views are also relevant when considering this

question from Appendix G of the CEQA Guidelines. Examples of focal views include natural landforms, public art/signs, individual buildings, and specific, important trees.

The Project Site is located in an urbanized area developed with a mix of low- to mid-rise commercial and residential uses. No panoramic views of valued visual resources are currently available from the Project Site. Views in the vicinity of the Project Site are largely constrained by existing structures on adjacent parcels. However, the area's relatively hilly topography offers occasional views from points of higher elevation south to Downtown LA, including the skyscrapers on Bunker Hill. The Project would not impede this view from Everett Street or adjacent points. Views from Everett to Downtown offer the greatest scenic vista and would not be blocked by the Project.

Sunset Boulevard slopes upwards and to the left (past Elysian Park Avenue) as it progresses north. This constrains views in that direction. Views east and west are already limited by the existing buildings and lack of elevated viewpoints. Everett Street slopes upwards and ends at Everett Park, where trees and vegetation impede certain views onto the Site. In addition, the slope to the rear of the Project Site elevates the adjacent residential uses on Everett Street to a level similar to the proposed buildings. See also **Figure 5.1-1** showing a view from Everett Park toward Downtown Los Angeles with the proposed building B in view. As shown, the proposed building would not block any views of Downtown Los Angeles.

**Figure 5.1-1**  
**Everett Park View**



Source: KTG Architects, February 6, 2024.

Points of visual interest in the area are the decorative facades of the three residential buildings on Sunset Boulevard, north of Marion Street, across from the Sunset portion. As no designated scenic vistas in the local area would be impeded, the Project will not substantially block scenic vistas.

Based on the above, due to the urbanized nature of the area, the Project would not block or obstruct views of visual resources. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, development of the Project would not have a substantial adverse effect on a scenic vista, and no impact would occur.

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

**No Impact.** The Project Site is not located along a state scenic highway. The closest officially designated state scenic highways are:<sup>3</sup>

- State Route 27, Topanga Canyon Boulevard, from Mulholland Highway to Pacific Coast Highway. This is 19.5 miles west of the Site.
- State Route 2, Angeles Crest Highway, from 3 miles north of I-210 in La Canada to the San Bernardino County Line. This is 11.5 miles northeast of the Site.

Sunset Boulevard is not a City of Los Angeles designated scenic highway.<sup>4</sup>

Therefore, the Project would not substantially damage scenic resources within a state scenic highway as no scenic highways are located adjacent to or near the Project Site. Moreover, pursuant to SB 743 and ZI No. 2452, the Project's aesthetics impact would not be considered a significant impact on the environment. Therefore, no impacts would occur.

**c) In non-urbanized areas, would the project 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 Site is located within an urbanized area. As such, this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

## Zoning

<sup>3</sup> Caltrans State Scenic Highways Map: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed August 25, 2023.

<sup>4</sup> Mobility Plan 2035: <https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/MobilityPlan2035.pdf>, accessed August 25, 2023.

With regard to zoning, the Project Site is zoned C2-1VL and is designated for General Commercial land uses by the General Plan. Corresponding Zones for this designation are RAS3, CR, C1.5, C2, C4, and P. In addition to commercial uses, the C2 zone permits residential uses at one (1) dwelling units per 400 square feet of lot area. The “1VL” suffix corresponds to the Height District, which in the C Zone permits a base 1.5:1 Floor Area Ratio (FAR) and a maximum height of 45 feet.

The Project proposes the development of a mixed-use project comprised of two buildings with 327 residential units that include 41 Very Low Income affordable units and approximately 9,462 square feet of ground-floor commercial space for a total floor area of 321,300 square feet. The proposed residential and commercial uses would be consistent with the types of uses permitted in the C2 zone of the Project Site, as described below. Furthermore, the Project’s proposed density, floor area, and height would be consistent with the City’s zoning regulations as well as the provisions of State Density Bonus Law and the City’s implementing ordinance that permit increased density as well as development incentives/concession for housing development projects that include prescribed amounts of restricted affordable housing units.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses, including a myriad of commercial and residential uses. The surrounding properties are also generally zoned for C2 commercial use, consistent with the zoning of the Project Site. As such, the proposed uses would not degrade the existing visual character or quality of the area.

The area surrounding the Project Site is highly urbanized and includes a mix of low- to mid-rise buildings containing a variety of uses. The proposed buildings would be an extension of the existing types of buildings already in the area and would not introduce a new visual feature that would be out of character for the area and overall Community Plan area. Therefore, the proposed building and height would not conflict with the existing visual character of the area surrounding the Project Site.

Local land use regulations applicable to the Project Site that include policies that address scenic quality include the Los Angeles Municipal Code (LAMC), the City of Los Angeles General Plan Framework Element (Framework Element), the Community Plan (Community Plan), and the Citywide Design Guidelines. These plans, policies, and regulations are discussed in more detail below.

### **General Plan Framework Element**

The City of Los Angeles General Plan Framework Element (Framework Element) provides direction regarding the City’s vision for future development in the City. Although the Framework Element does not directly address the design of individual neighborhoods or communities, it embodies general neighborhood design policies and implementation programs that guide local planning efforts. Specifically with regard to aesthetics, the Framework Element includes goals, policies, and objectives regarding the scale and character of neighborhoods, the quality of development and public realm (Chapter 5), and topics related to lighting (Chapter 9). The Project’s consistency with each of the relevant goals, policies, and objectives is also outlined in **Table 5.1-1**.

**Table 5.1-1  
Applicable Goals, Objectives, and Policies of the General Plan**

Goal/Objective/Policy	Analysis of Project Consistency
<b>General Plan Framework Element Land Use Chapter (Chapter 3)</b>	
<p><b>Policy 3.7.4:</b> Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.</p>	<p><b>No Conflict.</b> The Project would replace the existing vacant and undeveloped use on the Project Site with a new mixed-use development consisting of 327 residential and live-work units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space. The proposed uses would be located within a two separate 7-story buildings that would be designed to unify and enhance the overall aesthetic environment of the Project Site and surrounding area.</p> <p>Furthermore, various open space areas, including a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street would also serve to improve the overall visual quality of the Project Site.</p> <p>As provided below, the Project would be consistent with applicable standards in the Urban Form and Neighborhood Design Chapter of the General Plan Framework Element as well as the Urban Design Chapter of the Community Plan. Thus, the Project would not conflict with this policy.</p>
<b>General Plan Framework Element Housing Chapter (Chapter 4)</b>	
<p><b>Objective 4.3:</b> Conserve scale and character of residential neighborhoods.</p>	<p><b>No Conflict.</b> The Project Site vicinity includes a mix of low- to mid-rise commercial and residential uses to be developed within an existing commercial neighborhood. While the Project would result in an increase in the building density and maximum height on the Project Site, the height and bulk of the Project would remain consistent in scale with the surrounding uses.</p> <p>The Project would be designed to complement the surrounding uses and respond to the low- to mid-scale character of the surrounding area. Specifically, the building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontage along Sunset Boulevard in proximity to the existing commercial neighborhood.</p> <p>The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors.</p>

Goal/Objective/Policy	Analysis of Project Consistency
	<p>Overall, the Project would provide a cohesive visual identity for the Project Site and would further develop the character of this community center. The architectural design would be responsive to the surrounding buildings and would activate the street frontage. Thus, the Project would not conflict with this objective.</p>
<b>General Plan Framework Element Urban Form and Neighborhood Design Chapter (Chapter 5)</b>	
<p><b>Objective 5.5:</b> Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.</p>	<p><b>No Conflict.</b> As described above, the Project would replace the existing commercial uses and surface parking area with a new mixed-use building comprised of 327 residential and live-work units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space.</p> <p>The Project would contribute to the quality of the public realm by providing a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street, which would create a community focal point and integrate the Project with the surrounding community.</p> <p>The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment and improving the quality of the public realm.</p> <p>Additionally, the Project would enhance the street frontages with attractive landscaping and would include pedestrian amenities and street activating uses such as outdoor dining. Overall, the Project would be designed to complement and enhance the surrounding area. Thus, the Project would not conflict with this objective.</p>
<p><b>Objective 5.8:</b> Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.</p>	<p><b>No Conflict.</b> While this is a citywide objective, the Project would support its implementation. The Project would create a pedestrian friendly environment by creating a street-level identity along Sunset Boulevard by providing a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street. The plaza would complement the commercial uses at the ground level and integrate the Project with the surrounding community.</p> <p>The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor. The Project would also provide new street trees along the perimeter of the Project Site, further enhancing the pedestrian environment.</p>

Goal/Objective/Policy	Analysis of Project Consistency
	Furthermore, the Project would include pedestrian-scale lighting fixtures and elements. Thus, the Project would not conflict with this objective.
<p><b>Policy 5.8.4:</b> Encourage that signage be designed to be integrated with the architectural character of the buildings and convey a visually attractive character.</p>	<p><b>No Conflict.</b> Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and wayfinding pedestrian signage that would comply with LAMC regulations, as applicable.</p> <p>No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light.</p> <p>Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property. Thus, the Project would not conflict with this policy.</p>
<p><b>Objective 5.9:</b> Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.</p>	<p><b>No Conflict.</b> While this is a citywide objective, the Project would support its implementation.</p> <p>The Project would include the use of security fencing, lighting, and locked entry during construction; the use of a closed-circuit camera system and keycard for entry into residential uses and residential parking; the provision of proper lighting of the buildings, walkways, and subterranean parking areas; and entrances, exits, and open space areas that are designed to be open and in view of surrounding areas.</p>
<b>General Plan Framework Element Infrastructure and Public Services Chapter (Chapter 9)</b>	
<p><b>Goal 9P:</b> Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.</p>	<p><b>No Conflict.</b> The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction.</p>

Goal/Objective/Policy	Analysis of Project Consistency
	All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations. Thus, the Project would not conflict with this goal.
<b>Objective 9.40:</b> Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.	<b>No Conflict.</b> Proposed lighting would be implemented in accordance with the lighting standards set forth in the California Building Code and the California Energy Code, which establish light intensities for various land uses. Furthermore, as discussed above under Goal 9P, the Project would minimize light pollution, light trespass, and glare. Thus, the Project would not conflict with this objective.
<b>Policy 9.40.1:</b> Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	<b>No Conflict.</b> Refer to the discussion for Goal 9P above.
<b>Policy 9.40.2:</b> Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	<b>No Conflict.</b> Refer to the discussion for Goal 9P above. The Project would provide sufficient lighting throughout the Project Site to ensure safety and visibility. The parking levels and pedestrian walkways would be well illuminated and designed to eliminate areas of concealment. Thus, the Project would not conflict with this policy.
<b>Policy 9.40.3:</b> Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for façade lighting, security lighting, and advertising lighting, including billboards.	<b>No Conflict.</b> While this policy is a citywide goal relating to lighting regulations, the Project would not conflict with its implementation. Refer to the discussion for Goal 9P above.
<b>General Plan Conservation Element (Section 15)</b>	
<b>Objective:</b> Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	<b>No Conflict.</b> The Project is located in an urban area and built out surroundings. Therefore, publicly available views of any valued visual resources in the vicinity of the Project Site would be maintained. Thus, the Project would not obstruct or remove access to natural and scenic vistas and would not conflict with this objective.
Project consistency with additional Framework Element goals, objectives, and policies is analyzed under Section 5.11, Land Use and Planning. Source: CAJA Environmental Services, 2023.	

The Project Site is vacant and undeveloped. The area surrounding the Project Site includes a mix of low to mid-rise commercial and residential uses. The Project would enhance the built environment in the surrounding area and upgrade the quality of development by replacing the existing uses with a new 321,300-square-foot mixed-use building comprised of 327 residential and live-work units (inclusive of 41 units reserved for Very Low-Income Households) and 9,462

square feet of ground-floor commercial space that would incorporate design elements that would enhance the quality of the visual environment. The building would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontage along Sunset Boulevard in proximity to the existing commercial neighborhood.

The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. The height of the new buildings would fit in with the context of the taller buildings along Sunset Boulevard at White Knoll Drive and would serve as a gateway project into the area. Overall, the Project would provide a cohesive visual identity for the Project Site and would further develop the character of this community center. The architectural design would be responsive to the surrounding buildings and activate the street frontage along Sunset Boulevard.

Additionally, the Project would contribute to the quality of the public realm by providing a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street, which would create a community focal point and integrate the Project with the surrounding community. The Project's street frontages would be designed to be highly visually permeable with floor to ceiling windows and transparent materials at the ground floor, thereby creating a pedestrian-friendly environment and improving the quality of the public realm. The Project would further enhance the street frontages with attractive landscaping and would include pedestrian amenities and street activating uses such as outdoor dining. Overall, the Project would be designed to complement and enhance the surrounding area.

The Project would also support the Framework Element's goals, policies and objectives related to lighting. Project lighting would be designed to minimize light trespass from the Project Site and would comply with all applicable LAMC requirements. In addition, any new street and pedestrian lighting within the public right-of-way would comply with applicable City regulation and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sideways and roadways while minimizing light and glare on adjacent streets.

Overall, the Project design would contribute to the overall quality of the visual environment and would not contrast with the varying design elements of the uses adjacent to the Project Site. The Project would be generally consistent with the applicable goals, policies, and objectives set forth in the Framework Element's regarding scenic quality as detailed above.

### **Silver Lake-Echo Park-Elysian Valley Community Plan**

As it relates to scenic quality, the Silver Lake-Echo Park-Elysian Valley Community Plan includes the following purpose:

*The Design Policies for commercial corridors emphasize the visual continuity of streetscapes and creation of an environment that encourages pedestrian and economic activity.*

As previously discussed, the area surrounding the Project Site is primarily developed with a mix of low- to mid-rise commercial and residential uses. The Project would construct two buildings

that provide a continuous activated street frontage along Sunset Boulevard with ground floor live/work units and commercial spaces, including a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street. Thus, the Project would be generally consistent with this Community Plan provision.

### **Citywide Design Guidelines**

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. The Project would not conflict with the Citywide Design Guidelines, as discussed below.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

The Project would enhance the pedestrian experience adjacent to and within the Project Site by incorporating a design that would provide a safe, comfortable, and accessible environment. Specifically, the Project ground-floor commercial spaces would be designed to be highly visually permeable with floor to ceiling windows and transparent materials, thereby creating a pedestrian-friendly environment and activating the streetscape.

In addition, the Project would install landscaping, including new trees as well as providing a plaza on the southern end of the Project Site at the intersection of Sunset Boulevard and Everett Street, which would create a community focal point and integrate the Project with the surrounding community. Access points would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.

The Project would also comply with Americans with Disabilities Act (ADA) requirements.

Furthermore, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Overall, these Project elements would promote a safe, comfortable, and accessible pedestrian experience for all. Thus, the Project would support this guideline.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

Vehicular access is to be provided by three driveways located along Sunset Boulevard:

1. The first driveway will be located at the signalized intersection of Sunset Boulevard and Marion Avenue.
2. The second driveway will be an unsignalized intersection located approximately 170 feet north of the main driveway.
3. The third driveway will also be an unsignalized intersection and will be located at the northern end of the Site.

All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. Thus, the Project would support this guideline.

**Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.**

The building uses a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontage along Sunset Boulevard in proximity to the existing commercial neighborhood. As previously discussed, the Project would activate the ground-floor along the street frontages by introducing new ground-floor commercial space, which would be designed to be highly visually permeable, thereby activating the streetscape. In addition, the Project would install landscaping, including new trees as well as providing a plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. Overall, the Project would be designed to actively engage with streets and public space and maintain human scale. Thus, the Project would support this guideline.

**Guideline 4: Organize and shape projects to recognize and respect surrounding context.**

As previously discussed, the Project Site is located within the Silver Lake-Echo Park-Elysian Valley Community Plan. The area surrounding the Project Site is predominantly developed with low to mid-rise commercial and residential uses. As previously described above, the scale, massing and location of the Project will respond to the unique shape of the site and the surrounding urban context. The buildings would utilize a variety of architectural materials and building planes to create a human-scaled building at the street level and activate the frontage along Sunset Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. Along each of the street frontages, there would be a variation between the ground floor commercial and live-work space and upper residential floors. Overall, relative to the surrounding development, the Project design would complement the varying design elements of the uses adjacent to the Project Site. Thus, the Project would support this guideline.

**Guideline 5: Express a clear and coherent architectural idea.**

In accordance with the spirit and intent of the Silver Lake-Echo Park-Elysian Valley Community Plan, the buildings use a variety of architectural materials and building planes to create a human-scaled development at the street level and activate the frontage along Sunset Boulevard in proximity to the existing commercial neighborhood. The Project design alternates different textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive façades. The proposed design employs a variety of elements to break down the building façade. Overall, the Project design would express an active, pedestrian-friendly, compatible design that would complement the varying design elements of the uses adjacent to the Project Site. Thus, the Project would support this guideline.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

As previously discussed, the Project would enhance the streetscape adjacent to the Project Site by developing an active ground floor commercial space and installing extensive landscaping. The Project would also feature a plaza on the southern end of the Project Site, which would create a community focal point and integrate the Project with the surrounding community. The plaza would provide a raised planter, seating, tables, and landscaping. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night. Thus, the Project would support this guideline.

Guideline 7: Carefully arrange design elements and uses to protect site users.

Parking would be provided within subterranean levels and in Levels 1 and 2 of the proposed buildings, which would be wrapped in active uses (residential or commercial) and landscaping. The Project would reduce the overall number of vehicular driveways and potential conflicts by providing full-access driveways on Sunset Boulevard. All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate. The Project would also include lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry to the commercial and residential uses. Thus, the Project would support this guideline.

Guideline 8: Protect the site's natural resources and features.

The Project Site is located in an urbanized area and is vacant and undeveloped. The Project Site contains limited to sparse landscaping in the form of nonnative/non protected trees, hedges, and shrubs. There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard. The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.<sup>5</sup> Therefore, there is nothing onsite or offsite that constitutes a protected tree or shrub.<sup>6</sup>

The Project will be required to provide at least 82 trees (327 units / 4). The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).<sup>7</sup>

<sup>5</sup> Protected Tree Report, JTL Consultants, August 31, 2023.

<sup>6</sup> LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*);(d) California Bay (*Umeellularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

<sup>7</sup> Plans, KTG Architecture and Planning, February 6, 2024.

The Project would replace the removed street trees in compliance with the City’s Urban Forestry Division standards and subject to approval by the Board of Public Works. Thus, the Project would support this guideline.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.

As discussed in Section 3, Project Description, of this SCEA, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen. The Project’s design is based on principles of smart growth and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit. “Green” features would include energy-efficient buildings, a pedestrian-friendly site design, and water conservation and waste reduction measures, among others. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable. Therefore, the Project would lower energy demand and increase the comfort and well-being of users through site layout, building massing, and orientation. Thus, the Project would support this guideline.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Project would be required to comply with the City’s Low Impact Development (LID) ordinance and implement standard erosion controls to limit stormwater runoff. As part of these requirements, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way. In addition, the Project would incorporate drought tolerant landscaping throughout the Project Site. Thus, the Project would support this guideline.

Based on the above, the Project would not conflict with applicable regulations governing scenic quality, including those contained in the LAMC, General Plan Framework Element, Community Plan, and Citywide Design Guidelines. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project’s aesthetics impact would not be considered significant. Therefore, no impacts would occur.

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

**No Impact.** Nighttime illumination of varying intensities is characteristic of most urban land uses, including those in the vicinity of the Project Site. New light sources introduced by a project may increase ambient nighttime illumination levels. Additionally, nighttime spillover of light onto adjacent properties has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime condition. The significance of the impact depends on the type of use(s) affected, proximity to the affected use(s), the intensity of the light source, and the existing ambient light environment. Uses considered sensitive to nighttime light

include, but are not limited to, residential, some commercial and institutional uses, and natural areas.

Glare occurs during both daytime and nighttime hours. Daytime glare is caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Daytime glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use.

## Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could occur in the evening hours and require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. Outdoor lighting sources, such as floodlights, spotlights, and/or headlights associated with construction equipment and hauling trucks, typically accompany nighttime construction activities. To the extent evening construction includes artificial light sources, such use would be temporary, for a short duration while construction activities conclude for the day and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements.<sup>8</sup> Additionally, as part of the Project, construction lighting would be shielded to minimize the potential for light spillover to affect adjacent residential properties. Project construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. Minor amounts of glare could also occur due to on-site vehicles. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Furthermore, as noted above, construction would primarily occur during the daytime hours in accordance with the LAMC. Therefore, there would be a negligible potential for nighttime glare associated with construction activities to occur, and impacts would be less than significant.

## Operation

Vehicle headlights from traffic on Sunset Boulevard, Marion Avenue, and Everett Street also contribute to overall ambient lighting levels. The Project would include low-level exterior lights along pathways for security and wayfinding purposes. In addition, low-level lighting to accent

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<sup>8</sup> LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units.

signage would be incorporated. All lighting would comply with current energy standards and regulations, as well as design requirements. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light spill-over from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over onto neighboring properties. All exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations.

Proposed signage would be designed to be aesthetically compatible with the proposed architecture of the building and its surroundings. Proposed signage would include identity signage, building and tenant signage, and general ground level and way-finding pedestrian signage that would comply with LAMC regulations and the provisions of the CDO, as applicable. No new billboards or other off-site advertising are proposed as part of the Project. The Project would also not include signage with flashing or mechanical properties. Proposed signage would be illuminated via low-level, low-glare external lighting, internal halo lighting, or ambient light. Exterior lighting for signage would be directed onto signs to avoid creating off site glare. Illumination used for Project signage would comply with light intensities set forth in the LAMC and as measured at the property line of the nearest residentially zoned property.

As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building façades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

Nighttime glare could result primarily from on-site illumination and vehicle headlights. As described above, the Project's illuminated signs would not exceed the prescribed LAMC lighting requirements. Furthermore, while headlights from vehicles entering and exiting the Project Site would be visible during the evening and nighttime hours, such lighting sources would be typical for the area. Thus, nighttime glare would not result in a substantial adverse impact.

The Project would adhere to existing regulatory requirements regarding light and glare, including those contained in the LAMC, the City's Green Building Code, and CALGreen (e.g., LAMC Section 93.0117(b), LAMC Section 99.05.106.8, CALGreen Section 5.106.8).

Thus, based on the above, construction and operation of the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant. Therefore, no impacts would occur.

## Cumulative Impacts

**Less Than Significant Impact.** A cumulative analysis of aesthetics impacts includes the Related Projects that would be sufficiently close to influence the visual character of the immediate Project

area, that fall within the same viewshed as the Project, or that affect the same off-site sensitive uses.

There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>9</sup>

Related Project No. 3 (1013 Everett Street, 150 feet north), Related Project No. 6 (1274 Sunset Boulevard, 240 feet northwest), Related Project No. 7 (1275 Sunset Boulevard, 260 feet north), Related Project No. 8 (1111 Sunset Boulevard, 200 feet south), and Related Project No. 9 (151 Sunset Boulevard, 5 feet north) are close enough to the Project Site to be considered in the cumulative analysis.

Only one of these Related Projects (No. 9) is directly adjacent to the Project Site, but would not block views of Sunset Boulevard due to the sloping elevation of the sites. The others are separated by existing roadways and intervening buildings. All Related Projects would result in an overall incremental intensification of land uses in the vicinity of the Project Site. However, the Project and Related Projects, including those identified above, would be required to comply with applicable City regulations, design guidelines, and other land use and zoning controls regarding density, floor area, lighting, and design.

Furthermore, as described above, the Project would result in less than significant impacts regarding scenic vistas, visual character, and light and glare. Moreover, pursuant to Senate Bill 743 and ZI No. 2452, the Project's aesthetics impact would not be considered significant.

Therefore, the Project's contribution to cumulative impacts regarding aesthetics would not be cumulatively considerable and cumulative impacts would be less than significant.

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<sup>9</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

## 1.2 Agriculture and Forest Resources

	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"/>

### SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM AG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential.
- b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.
- c) Maintain and expand agricultural land protections such as urban growth boundaries.

- d) Provide for mitigation fees to support a mitigation bank<sup>10</sup> that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.
- e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access.
- f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.

### ***Applicability to the Project***

As analyzed below, the Project would not convert farmland to a non-agricultural use, and therefore, **PMM AG-1** is not applicable to the Project.

**PMM AG-2:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts.
- b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection

### ***Applicability to the Project***

The Project Site is not zoned for agricultural production, there is no farmland on the Project Site, and there are no Williamson Act Contracts in effect for the Project Site. Thus, **PMM AG-2** is not applicable to the Project.

**PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

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<sup>10</sup> The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website.

- 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.

### ***Applicability to the Project***

The Project Site does not contain forest land or timberland and therefore, **PMM AG-3** is not applicable to the Project.

**PMM AG-4:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
- b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
- c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.

### ***Applicability to the Project***

The Project Site is not zoned for agricultural uses and there is no farmland on the Project Site. Thus, **PMM AG-4** is not applicable to the Project.

**PMM AG-5:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:

- a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby

agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.

### ***Applicability to the Project***

The Project Site is not zoned for agricultural uses and is not located adjacent to agricultural uses. Thus, **PMM AG-5** is not applicable to the Project.

### **Impact Analysis**

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

**No Impact.** The Project Site is located in an urbanized area of the City and is zoned C2-1VL (Commercial zone in Height District 1 Very Limited) and General Commercial designation).

The Project Site is vacant. No agricultural uses or operations occur on-site or directly adjacent to the Project Site.

The Project Site and surrounding area are designated Urban and Built-Up Land and not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.<sup>11</sup>

Thus, the Project would not convert farmland to a non-agricultural use and no impact would occur.

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

**No Impact.** The Project Site is located in an urbanized area of the City and is zoned C2-1VL (Commercial zone in Height District 1 Very Limited) and General Commercial designation). As such, the Project Site is not zoned for agricultural use.<sup>12</sup> Furthermore, no agricultural zoning is present in the surrounding area.

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter contracts with private landowners for the purpose of restricting

<sup>11</sup> State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2018, Map, websites: <https://maps.conservation.ca.gov/DLRP/CIFF/>, and <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, accessed August 29, 2023.

<sup>12</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments which are much lower than normal because they are based upon farming and open space uses as opposed to full market value. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.<sup>13</sup>

Therefore, the Project would not conflict with any existing zoning for agricultural uses or a Williamson Act Contract and no impact would occur.

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

**No Impact.** The Project Site is vacant. The Project Site does not include any forest land or timberland. In addition, the Project Site is currently zoned for commercial uses and is not zoned and/or used as forest land.<sup>14</sup>

Thus, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by Public Resources Code section 12220(g), Public Resources Code section 4526, and Government Code section 51104(g) and no impact would occur.

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

**No Impact.** The Project Site is zoned for commercial uses and is vacant. The Project Site is located in an urbanized area and is not used as forest land.

Therefore, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur.

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

**No Impact.** As described above, the Project Site is located within an urbanized area and there is no farmland or forest land on or near the Project Site.

Therefore, the Project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest use and no impact would occur.

### **Cumulative Impacts**

**No Impact.** The geographic context for a cumulative impact analysis on agriculture resources is the County of Los Angeles (County), and the geographic context for the cumulative analysis on forest resources is CAL FIRE's 19.9-million-acre South Coast area, which encompasses four

<sup>13</sup> State of California Department of Conservation, Williamson Act Program, website: <https://www.conservation.ca.gov/dlrp/wa>, accessed August 29, 2023.

<sup>14</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

national forests (Angeles, Cleveland, Los Padres, and San Bernardino) and other federal, state-, and privately-owned land.

The Project and the Related Projects are located within a developed, urbanized area of the City generally zoned for commercial and residential uses and do not support existing farming, agricultural, or forest-related operations. Therefore, development of the Related Projects together with the Project would not result in the conversion of State-designated agricultural land from an agricultural use to a non-agricultural use or result in the loss of forest land or the conversion of forest land to non-forest use.

Therefore, the Project's contribution to cumulative impacts regarding agricultural resources would not be cumulatively considerable and no cumulative impacts would occur.

## 1.3 Air Quality

	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"/>

This section is based on the following item, which is included as **Appendix B** to this SCEA:

**B** Air Quality Technical Report and Technical Appendix, DKA Planning, October 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Minimize land disturbance.
- b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
- c) Cover trucks when hauling dirt.
- d) Stabilize the surface of dirt piles if not removed immediately.
- e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads
- f) Minimize unnecessary vehicular and machinery activities.

- g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
- i) On Caltrans projects, Caltrans Standard Specifications 10—Dust Control, 17—Watering, and 18—Dust Palliative shall be incorporated into project specifications.
- j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.
- k) Ensure that all construction equipment is properly tuned and maintained.
- l) Minimize idling time to 5 minutes or beyond regulatory requirements—saves fuel and reduces emissions.
- m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
- n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.
- p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate

consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.

- q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet 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.
- r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
- s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
- t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
- u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- v) As applicable for airport projects, the following measures should be considered:
  - a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider

- single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines.
- b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
  - c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.
- w) As applicable for port projects, the following measures should be considered:
- a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).
  - b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.
  - c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.
  - d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.
  - e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.
  - f. Encourage the participation in the Green Ship Incentives.
  - g. Offer incentives to encourage the use of on-dock rail.
- x) As applicable for rail projects, the following measures should be considered:
- a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards.
- y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

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- z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.
- a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside.
  - b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued.
  - c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents.
  - d. Provide information to residents on where MERV filters can be purchased.
  - e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.
  - f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time.
  - g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units.
  - h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and
  - i. Develop a process for evaluating the effectiveness of the enhanced filtration units.
- aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities
- bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
  - Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or

CARB to reduce PM emissions by a minimum of 85%. diesel engines on site shall be Tier 2 or higher.

- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
  - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
  - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
  - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator on-site, includes:

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- i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
  - ii. Any problems with the equipment or emission controls.
  - iii. Certified copies of fuel deliveries for the time period that identify:
    1. Source of supply
    2. Quantity of fuel
    3. Quantity of fuel, including sulfur content (percent by weight)
- cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:
- Install programmable thermostat timers
  - Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).
  - Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
  - Install higher efficacy public street and area lighting
  - Limit outdoor lighting requirements
  - Replace traffic lights with LED traffic lights
  - Establish on-site renewable or carbon neutral energy systems—generic, solar power and wind power
  - Utilize a combined heat and power system
  - Establish methane recovery in Landfills and Wastewater Treatment Plants.
  - Locate project near bike path/bike lane
  - Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.
  - Provide traffic calming measures, such as:
    - i. Marked crosswalks

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- ii. Count-down signal timers
  - iii. Curb extensions
  - iv. Speed tables
  - v. Raised crosswalks
  - vi. Raised intersections
  - vii. Median islands
  - viii. Tight corner radii
  - ix. Roundabouts or mini-circles
  - x. On-street parking
  - xi. Chicanes/chokers
  - Create urban non-motorized zones
  - Provide bike parking in non-residential and multi-unit residential projects
  - Dedicate land for bike trails
  - Limit parking supply through:
    - i. Elimination (or reduction) of minimum parking requirements
    - ii. Creation of maximum parking requirements
    - iii. Provision of shared parking
  - Require residential area parking permit.
  - Provide ride-sharing programs
    - i. Designate a certain percentage of parking spacing for ride sharing vehicles
    - ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
    - iii. Providing a web site or messaging board for coordinating rides
    - iv. Permanent transportation management association membership and finding requirement.

### ***Applicability to the Project***

The measures included in **PMM AQ-1** are not applicable to the Project as existing regulatory measures that would apply to the Project, including those identified by the California Air Resources Board (CARB) and SCAG to facilitate consistency with applicable air quality plans, as discussed below, are equal to or more effective than the measures of **PMM AQ-1**, such that the Project would not result in any substantial adverse effects related to violating air quality standards. In addition, as described below, the Project will implement **Project Design Feature PDF-AIR-1** regarding the use of Tier 4 construction equipment. Accordingly, the Project is consistent with **PMM AQ-1**.

### **Impact Analysis**

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

**Less Than Significant Impact.** The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O<sub>3</sub>]).

SCAQMD's 2022 Air Quality Management Plan (2022 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2022 AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by SCAG.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.<sup>15</sup> With regard to future growth, SCAG has prepared the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2020–2045 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP. The 2020-2045 RTP/SCS accommodates 4,771,300 persons; 1,793,000 households; and 2,135,900 jobs in the City of Los Angeles by 2045.

The 2022 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2020–2045 RTP/SCS. SCAG is charged by California law to prepare and approve “the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies.” Projects whose growth is

<sup>15</sup> SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in detail in Part 3, Project Description, of this SCEA, the Project would include a new mixed-use building on an approximately 2.459-acre site. The Project would include new residential and retail uses totaling 321,300 square feet. Specifically, the Project would provide 327 residential units, including 41 affordable housing units, and 9,462 square feet of commercial uses.

As discussed under Checklist Section 14, Population and Housing, below, it is expected that the Project would increase population and number of jobs by 773 residents and new 38 employees.<sup>16</sup> This increase in population and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region.

The Project's residential population would represent approximately 0.09 percent of the forecast population growth between 2016 and 2045 in the RTP/SCS. The Project's employment population would represent approximately 0.01 percent of the forecast job growth between 2016 and 2045.

Furthermore, while the Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout, these would be short-term opportunities and are employment positions that circulate throughout the region based on the construction site. Therefore, because the Project would result in a minimal increase in population and permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2020–2045 RTP/SCS and which were used in the 2022 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2022 AQMP.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.

<sup>16</sup> [Transportation Assessment](#), Fehr & Peers, October 2023. VMT Calculator, which provides total population and employees.

- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

The City’s General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City’s clean air goals. As illustrated in **Table 5.3-1**, the Project is consistent with the applicable policies in the Air Quality Element, as the Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage the use of alternative modes of transportation. Therefore, the Project would result in a less than significant impact related to consistency with the Air Quality Element.

**Table 5.3-1**  
**Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
<b>Policy 1.3.1.</b> Minimize particulate emissions from construction sites.	<b>Consistent.</b> The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
<b>Policy 1.3.2.</b> Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	<b>Not Applicable.</b> The Project would not involve use of unpaved roads or parking lots.
<b>Policy 2.1.1.</b> Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	<b>Consistent.</b> The proposed development would include retail and restaurant employees that could access transportation options to driving to work. The Project Site is well-served by public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro’s Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active transportation. In addition, the live/work units will help reduce travel demand.
<b>Policy 2.1.2.</b> Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	<b>Consistent.</b> Residents could use high-speed telecommunications services as an alternative to driving to work. A June 2020 study by the National Bureau of Economic Research found that 37 percent of jobs can be performed entirely from home ( <a href="https://www.nber.org/papers/w26948">https://www.nber.org/papers/w26948</a> ). As such, the Proposed Project could help reduce commuting to work through telecommuting.

**Table 5.3-1**  
**Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	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> As the Project Site is subject to AB 2097 and therefore not required to provide any minimum amount of vehicular parking, the Project would discourage car ownership and resulting single-occupant vehicle use because of the limited parking (263 spaces) for residents and merchants.</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> As noted above, AB 2097 allows the Project's garage to be limited to parking for 263 vehicles. This would reduce car ownership for residents and resulting single-occupant vehicle trips. The development would provide transit and active transportation options to residents as an option to driving.</p>
<p><b>Policy 2.2.3.</b> Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.</p>	<p><b>Not Applicable.</b> The Project would not include facilities for special events.</p>
<p><b>Policy 3.2.1.</b> Manage traffic congestion during peak hours.</p>	<p><b>Consistent.</b> The Project is a low traffic generator because of the nature of residential uses, which generate peak hour vehicle trips that are lower than commercial, retail, and restaurant uses. Further, the Project would also minimize traffic congestion based on its location near transit opportunities, which would encourage the use of alternative modes of transportation. Residents, workers, and visitors can use public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro's Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active transportation. In addition, the live/work units will help reduce travel demand.</p>
<p><b>Policy 4.1.1.</b> Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.</p>	<p><b>Consistent.</b> The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.</p>
<p><b>Policy 4.1.2.</b> Ensure that project level review and approval of land use development remains at the local level.</p>	<p><b>Consistent.</b> The Project would be entitled and environmentally cleared at the local level. The Project would not inhibit the implementation of this policy.</p>
<p><b>Policy 4.2.1.</b> Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.</p>	<p><b>Not Applicable.</b> This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.</p>

**Table 5.3-1**  
**Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
<b>Policy 4.2.2.</b> Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	<b>Consistent.</b> The Project would be infill development that would provide the City's residents with proximate access to jobs and services at this Project Site.
<b>Policy 4.2.3.</b> Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	<b>Consistent.</b> The Project would promote public transit, active transportation, and alternative fuel vehicles for residents, workers, and visitors, who can use public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro's Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active transportation. In addition, the live/work units will help reduce travel demand. The Project would also include 27 electric vehicle charging stations and 66 more spaces with conduits and supplies for future charging stations.
<b>Policy 4.2.4.</b> Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	<b>Consistent.</b> The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
<b>Policy 4.2.5.</b> Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	<b>Consistent.</b> The proposed project would support use of alternative transportation modes. The Project Site is well-served by public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro's Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active transportation. In addition, the live/work units will help reduce travel demand.
<b>Policy 4.3.1.</b> Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	<b>Not Applicable.</b> This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.
<b>Policy 4.3.2.</b> Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are	<b>Not Applicable.</b> This policy calls for City updates to its General Plan. The Project would not inhibit the implementation of this policy.

**Table 5.3-1  
Project Consistency with City of Los Angeles General Plan Air Quality Element**

Strategy	Project Consistency
located to minimize significant health risks to sensitive receptors.	
<b>Policy 5.1.1.</b> Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	<b>Not Applicable.</b> This policy calls for cleaner operations of the City's water port and airport facilities. The Project would not inhibit the implementation of this policy.
<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.	<b>Not Applicable.</b> This policy calls for cleaner operations of the City's buildings and operations. The Project would not inhibit the implementation of this policy.
<b>Policy 5.1.3.</b> Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	<b>Not Applicable.</b> This policy calls for cleaner operations of the City's Water and Power energy plants. The Project would not inhibit the implementation of this policy.
<b>Policy 5.1.4.</b> Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	<b>Consistent.</b> The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption. This includes the City's March 2010 ordinance (Council File 09-3029) that requires all mixed construction and demolition waste be taken to City-certified waste processors.
<b>Policy 5.2.1.</b> Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	<b>Not Applicable.</b> This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements. The Project's support of electric vehicles will continue the State's conversion to zero emission fleets that do not required engine inspections
<b>Policy 5.3.1.</b> Support the development and use of equipment powered by electric or low-emitting fuels.	<b>Consistent.</b> The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code, both of which promote a shift from natural gas use toward electrification of buildings. The Project would also include 27 electric vehicle charging stations and 66 more spaces with conduits and supplies for future charging stations.
<b>Policy 6.1.1.</b> Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	<b>Not Applicable.</b> This policy calls for the City to promote clean air awareness through its public awareness programs. The Project would not inhibit the implementation of this policy.
Source: DKA Planning, 2023.	

As described in Part 3, Project Description, of this SCEA, the Project would add residential and commercial uses resulting in increases in population and employees. The Project's location within an existing urban area would reduce per capita vehicle miles traveled (VMT) and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further under Checklist Section 17, Transportation, and in the Transportation Assessment included as

**Appendix K-1** of this SCEA (which includes the VMT Calculator run for the Project).<sup>17</sup> High population density would result in employees potentially living closer to the Project Site, reducing travel distances and overall VMT. The Project’s 327 residential units, including the 41 affordable units, would provide the opportunity for area workers to live within close proximity to their place of employment.

In addition, the Project includes 21 short and 183 long term bicycle parking spaces for the proposed uses, would be developed in an urban area within close proximity to residential uses, and would include on-site EV and EV-ready parking, thereby facilitating a reduction in VMT as discussed under Checklist Section 17 and the Transportation Assessment. The Project would also include primary entrances for pedestrians and bicyclists that would be safe and easily accessible. As part of the Project, bicycle racks (i.e., 21 short-term and 183 long-term) would be installed, thereby further promoting the use of an alternative mode of transportation.

As shown in **Table 5.3-2** (construction) and **Table 5.3-3** (operation) in the analysis below, Project implementation would not exceed California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>), the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the 2022 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD’s AQMP, and impacts would be less than significant.

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

**Less Than Significant Impact.** As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.<sup>18</sup>

## Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from site preparation, grading, and construction activities. Mobile source emissions, primarily particulate

<sup>17</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>18</sup> SCAQMD, Air Quality Analysis Guidance Handbook, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed August 29, 2023.

matter and nitrogen oxides (NO<sub>x</sub>), would result from the use of construction equipment such as loaders, graders, backhoes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (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 criteria set forth in the SCAQMD 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 SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO<sub>x</sub>; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO<sub>x</sub>); (5) 150 pounds per day for PM<sub>10</sub>; and (6) 55 pounds per day for PM<sub>2.5</sub>.<sup>19</sup>

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 30-month period (e.g., approximately late December 2024 through end of June 2027). Construction would require approximately 40,000 cubic yards of total soil export. Details are provided in **Appendix B** of this SCEA.

### Project Design Feature

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

- PDF-AIR-1:** Construction equipment operating at the Project Site shall be subject to the requirements listed below.
- 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

<sup>19</sup> SCAQMD, Air Quality Analysis Guidance Handbook, [www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook), accessed August 29, 2023.

Resources Board certified Level 3 Diesel Particulate Filter or equivalent.

### Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2022.1.1.17. Model results are provided in **Appendix B** of this SCEA. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. Note, however, that the CalEEMod results omit the implementation of **Project Design Feature PDF-AIR-1**, which would further reduce construction-period emissions, for purposes of conservative analysis.

A summary of unmitigated maximum daily regional emissions for Project construction is presented in **Table 5.3-2**, along with the regional significance thresholds for each air pollutant. As shown in **Table 5.3-2**, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. As a result, regional construction emissions resulting from the Project would result in a less than significant impact, and no mitigation measures are required.

### Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.<sup>20</sup> SCAQMD provides LSTs applicable to the following criteria pollutants: NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. SCAQMD does not provide an LST for SO<sub>2</sub> since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O<sub>3</sub> formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate lookup tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres (in increments of 1, 2, or 5 acres). The 2-acre LST rates are used here. While the Project Site is 2.459 acres, the use of an SCAQMD threshold for a smaller site ensures a more conservative threshold of significance that is more protective of public health.

Estimates of maximum construction-related localized (on-site) daily emissions for NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub> are presented in **Table 5.3-2**. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained

<sup>20</sup> SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

from the LST lookup tables. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences to the east of the Project Site on Everett Street. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.<sup>21</sup>

As presented in **Table 5.3-2**, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

**Table 5.3-2  
Daily Construction Emissions**

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2024	0.2	2.1	1.9	<0.1	0.7	0.2
2025	5.9	42.5	68.3	0.1	5.8	2.5
2026	5.5	40.9	66.5	0.1	5.6	2.3
2027	38.0	48.8	78.9	0.1	6.5	2.7
Maximum Regional Total	38.0	48.8	78.9	0.1	6.5	2.7
Regional Threshold	75	100	550	150	150	55
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Maximum Localized Total	36.7	45.8	57.6	0.1	1.6	1.5
Localized Threshold	N/A	108	1,048	N/A	8	5
<b>Exceed Threshold?</b>	<b>N/A</b>	<b>No</b>	<b>No</b>	<b>N/A</b>	<b>No</b>	<b>No</b>
<p>The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions), but omits <b>PDF-AIR-1</b> for purposes of conservative analysis.</p> <p>Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.17 model runs. LST analyses based on two-acre site with 25-meter distances to receptors in Central LA source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.</p>						

## Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy, water usage, and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the trip generation and VMT analysis included in the Transportation Assessment, included as **Appendix K-1** of this SCEA. The VMT analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated

<sup>21</sup> SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

### Regional Impacts

The results of the modeled emissions calculations are provided in **Table 5.3-3**, and CalEEMod model output files are provided in **Appendix B** of this SCEA. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

### Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in **Table 5.3-3**. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in **Table 5.3-3**, on-site localized operational emissions would not exceed any of the LSTs for NO<sub>x</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>.

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards.<sup>22</sup> No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

Air quality data from the SCAQMD Central LA monitoring station between years 2019–2021 indicate that the maximum CO levels in recent years are 2.0 ppm (1-hour average) and 1.6 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).<sup>23</sup>

**Table 5.3-3**  
**Daily Operations Emissions**

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	9.9	0.2	23.6	<0.1	<0.1	<0.1
Energy Sources	0.1	1.1	0.6	<0.1	0.1	0.1
Mobile Sources	5.7	3.8	43.7	0.1	9.7	2.5
Regional Total	15.7	5.1	67.8	0.1	9.8	2.6
Regional Significance Threshold	55	55	550	150	150	55
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Localized Total	9.9	1.3	24.2	<0.1	0.1	0.1
Localized Significance Threshold	N/A	108	1,048	N/A	2	2

22 SCAQMD, Historical Data by Year, [www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year](http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year), accessed August 29, 2023.

23 SCAQMD, Historical Data by Year, [www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year](http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year), accessed August 29, 2023.

**Table 5.3-3  
Daily Operations Emissions**

Exceed Threshold?	N/A	No	No	N/A	No	No
LST analyses based on two-acre site with 25-meter distances to receptors in Central Los Angeles SRA Source: DKA Planning, 2023 based on CalEEMod 2022.1.1.17 model runs (included in the Technical Appendix). Totals reflect the summer season maximum and may not add up due to rounding.						

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project-impacted intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, 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>24</sup> This intersection is located near the on and offramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 in Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.<sup>25</sup> The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.<sup>26</sup> The AQMP CO hotspots modeling also took into account worst-case meteorological conditions and background CO concentrations. Metro evaluated the level of service (LOS) in the vicinity of the Wilshire Boulevard and Veteran Avenue intersection and found it to be LOS E at peak morning traffic and LOS F at peak afternoon traffic.<sup>27,28</sup> As an initial screening step, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot.

At buildout of the Project, the Project is projected to have a net increase of 1,850 daily trips as calculated by the City's VMT Calculator as discussed under Checklist Section 17, Transportation, and the Transportation Assessment, included in **Appendix K-1** of this SCEA. The addition of these trips to any of the nearest study intersections would not result in an average daily traffic

24 SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24,.

25 The 8-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.

26 Based on the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

27 The Metropolitan Transportation Authority measured traffic volumes and calculated the LOS for the intersection of Wilshire Blvd./Sepulveda Ave. which is a block west along Wilshire Blvd., still east of Interstate 405.

28 Metropolitan Transportation Authority. 2004. Congestion Management Program for Los Angeles County. Exhibit 2-6 and Appendix A.

volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the Project does not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Thus, impacts would be less than significant, and no Project mitigation would be required.

**c) Would the project 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 or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, 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; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

There are several sensitive receptors within 0.25 miles of the Project Site that could be exposed to air pollution from construction and operation of the Project, including, but are not limited to, the following representative sampling:

- Residences, Everett Street (west side); as close as five feet east of the Project Site.
- Residential structures<sup>29</sup>, 1251-1255 Sunset Boulevard, five feet north of the Project Site.
- Residences, Everett Street (east side); 60 feet east of the Project Site.
- Residences, Sunset Boulevard (west side); as close as 100 feet west of the Project Site.
- Residences, 1190 Sunset Boulevard; 110 feet west of the Project Site.
- Residences, 1271 Sunset Boulevard; 200 feet north of the Project Site.
- Everett Park, 250 feet east of the Project Site.
- Preschool, 707 Kensington Road; about 500 feet west of the Project Site.

As discussed above, construction and operation of the Project would result in less than significant impacts relative to both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project

<sup>29</sup> Note these structures are abandoned and have been since at least early 2021. However, for conservative analysis, this analysis assumes these could be sensitive receptors that could be re-occupied.

construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant, and no mitigation measures are required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

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

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

**Less Than Significant Impact.** No objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as it would include residential, retail, and restaurant uses. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations. In particular, SCAQMD Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Based on the above, construction and operation of the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people, and impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** According to SCAQMD, individual projects that exceed SCAQMD’s recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As discussed above, the Project’s construction-related and operational air quality emissions would be less than significant. Therefore, the Project’s contribution to cumulative air quality impacts due to air emissions would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each Related Project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each Related Project would not result in a long-term substantial source of TAC emissions. Additionally, SCAQMD’s CEQA Air Quality Handbook and SCAQMD’s supplemental online guidance/information do not require an HRA for short-term construction emissions. It is, therefore, not required or meaningful to evaluate long-term cancer impacts from construction activities which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative TAC emission impacts during construction would be less than significant.

With respect to TAC emissions, neither the Project nor any of Related Projects (which are largely residential, retail/commercial, and institutional), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. However, the Project and Related Projects would be subject to SCAQMD permitting and best available control technology (BACT) requirements to limit pollutant emissions. The Project and Related Projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB’s Land Use Guidelines, and the Project and Related Projects would not result in a cumulative impact requiring further evaluation. However, the Related Projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs CARB to identify substances as TACs and adopt airborne toxic control

measures to control such substances, SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, as discussed above, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines and thus, would not contribute to a cumulative impact.

In conclusion, during construction and operation, the Project's regional, localized, and TAC emissions would not be cumulatively considerable, and cumulative impacts would be less than significant.

## 1.4 Biological Resources

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

This section is based on the following item, which is included as **Appendix C** to this SCEA:

**C** Protected Tree Report, JTL Consultants, August 31, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM BIO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as

applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
- b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include:
  - i. Impact minimization strategies
  - ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts
  - iii. Use of in-kind mitigation bank credits
  - iv. Funding of research and recovery efforts
  - v. Habitat restoration
  - vi. Establishment of conservation easements
  - vii. Permanent dedication of in-kind habitat.
- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- h) Appoint a qualified biologist to monitor implementation of mitigation measures.
- i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

- j) Develop an invasive species control plan associated with project construction.
- k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
- l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.
- n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.
- o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species

### ***Applicability to the Project***

As discussed below, the Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area.

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard. The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.<sup>30</sup>

The Project would result in the removal of existing trees from the Project Site as well as construction in close proximity to the existing street trees, where migratory birds and other species (e.g., bats) could potentially nest or roost. Accordingly, as discussed below in connection with **PMM BIO-4** and in conformance with the regulatory requirements of the Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement Project-specific mitigation measure **MM-BIO-1** which would ensure that potential construction-related impacts on nesting birds would not occur. In addition, the Project would incorporate relevant measures from SCAG Mitigation Measure **PMM BIO-1** (specifically, **PMM BIO-1(g)** and **PMM BIO-1(i)**) that would be applicable to non-avian protected species (e.g., bats), and would ensure that potential impacts to such species would be reduced to less than significant levels. The remainder of the measures

<sup>30</sup> [Protected Tree Report](#), JTL Consultants, August 31, 2023.

included in **PMM BIO-1** are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

**PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.

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

### ***Applicability to the Project***

As discussed below, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Therefore, **PMM BIO-2** is not applicable to the Project.

**PMM BIO-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

- a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.
- b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
- c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
  - Permittee-responsible mitigation

- Contribution of in-kind in-lieu fees
  - Use of in-kind mitigation bank credits
  - Where avoidance is determined to be infeasible and
- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
- Avoidance
  - Impact Minimization On-site alternatives
  - On-site alternatives
  - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

### ***Applicability to the Project***

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Therefore, the measures included in **PMM BIO-3** are not applicable to the Project.

**PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.

- c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
- e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on and off-site.
- i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.
- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.

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- n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
- Wildlife movement buffer zones
  - Corridor realignment
  - Appropriately spaced breaks in center barriers
  - Stream rerouting
  - Culverts
  - Creation of artificial movement corridors such as freeway under or overpasses
  - Other comparable measures
- p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:
- Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

- Design exterior lighting to confine illumination to the project site
  - Provide structural and/or vegetative screening from light-sensitive uses.
  - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
  - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
  - 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.
  - 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.
  - 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.
  - 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.

- 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.
  - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
  - Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- u) Require large buffers between sensitive uses and freeways.
- v) Create corridor redundancy to help retain functional connectivity and resilience.

### ***Applicability to the Project***

As discussed above, consistent with **PMM BIO-4(e)** and **PMM BIO-4(f)** from the 2020–2045 RTP/SCS PEIR, the Project would implement the Project-specific mitigation measure **MM-BIO-1** to ensure that potential construction-related impacts on nesting birds would not occur, in compliance with the Migratory Bird Treaty Act and California Fish and Game Code. Due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, the remainder of the measures identified under **PMM BIO-4** are not applicable to the Project.

**PMM BIO-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.

- b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
- c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
- d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
- f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.

- h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources
- i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
- Avoidance strategies
  - Contribution of in-lieu fees
  - Planting of replacement trees
  - Re-landscaping areas with native vegetation post-construction
  - Other comparable measures developed in consultation with local agency and certified arborist.

### ***Applicability to the Project***

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Furthermore, while the existing street trees adjacent to the Site are not a protected tree or shrub species, **Project Design Feature PDF-BIO-1** has been incorporated to identify the specific protections for these trees that will be implemented during Project construction activities. Thus, **PMM BIO-5** is not applicable to the Project.

**PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.

- b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.
- c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.

### ***Applicability to the Project***

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, **PMM BIO-6** is not applicable to the Project.

### **Impact Analysis**

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

**Less Than Significant With Mitigation Incorporated.** The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.<sup>31</sup> The tree-of heaven trees onsite are generally considered an invasive plant, rather than trees. These will be removed to accommodate the proposed buildings, and the Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).<sup>32</sup>

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard. The seven Mexican fan palms on the Sunset Boulevard sidewalk will be protected during the development project by installing tree protection fencing around the trees, and the Project arborist will be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures.<sup>33</sup> These protective measures are identified by **Project Design Feature PDF-BIO-1** which has been incorporated into the Project:

<sup>31</sup> Protected Tree Report, JTL Consultants, August 31, 2023.

<sup>32</sup> Plans, KTG Architecture and Planning, February 6, 2024.

<sup>33</sup> Protected Tree Report, JTL Consultants, August 31, 2023.

## Project Design Feature

### PDF-BIO-1: Street Tree Protection

The Project Applicant/contractor shall install tree protection fencing around the seven Mexican fan palms on Sunset Boulevard to be protected. The Project Arborist shall be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures. The fencing shall be maintained throughout the grading and construction phase, and shall not be removed until the completion and cessation of all construction activities.

### Migratory Birds

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. However, birds protected by the Migratory Bird Treaty Act may nest within the trees that would be removed as part of the Project.

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”

Consistent with the relevant measures associated with the Migratory Bird Treaty Act identified under **PMM-BIO-4**, the Project would implement **Mitigation Measure MM-BIO-1** to ensure potential construction-related impacts on nesting birds would not occur:

### Mitigation Measure

**MM-BIO-1:** The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.
- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the

nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.

## Bats

In addition to species covered under the Migratory Bird Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits "take" or possession of all nongame mammals or parts thereof.

Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered "take" as defined in Section 86 of the California Fish and Game Code. While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities. Thus, construction activities could have a significant impact on bats, which are a protected species.

As discussed above, the 2020–2045 RTP/SCS PEIR MMRP contains mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include **PMM BIO-1**, listed in detail above, which identifies measures to reduce substantial adverse effects related to threatened and endangered species and other special status species. As discussed above, **Mitigation Measure MM-BIO-1** will be implemented to address potential construction-related impacts to avian species in proximity to the Site. The Project would also incorporate the following mitigation measures from the 2020–2045 RTP/SCS PEIR MMRP to address potential impacts to non-avian protected species (e.g., bats):

### RTP/SCS Mitigation Measures

- PMM BIO-1(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.
- PMM BIO-1(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.

Implementation of **Mitigation Measure MM-BIO-1** as well as **PMM BIO-1(g)** and **PMM BIO-1(i)** from the 2020–2045 RTP/SCS PEIR MMRP outlined above, would ensure that the Project would not 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 by the CDFW or USFWS. Thus, impacts would be less than significant with incorporation of mitigation measures.

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

**Less Than Significant Impact.** The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

The Project Site is surrounded by a mix of low to mid-rise commercial and residential uses. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.<sup>34,35</sup>

Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.<sup>36,37</sup>

In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.<sup>38,39</sup>

Therefore, the Project would not 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 and impacts would be less than significant.

34 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) 6 website: <https://wildlife.ca.gov/Data/BIOS.gov/bios/>, accessed August 30, 2023.

35 United States Fish and Wildlife Service, National Wetlands Inventory (NWI), [www.fws.gov/wetlands/data/Mapper.html](http://www.fws.gov/wetlands/data/Mapper.html), accessed August 30, 2023.

36 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3, and Navigate LA, Significant Ecological Areas layer: <http://navigatela.lacity.org/navigatela/>, accessed August 30, 2023.

37 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015: <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>, accessed August 30, 2023.

38 California Department of Fish and Wildlife, BIOS 6 website: <https://wildlife.ca.gov/Data/BIOS.gov/bios/>, accessed August 30, 2023.

39 California Department of Fish and Wildlife, CDFW Lands Viewer: website: <https://wildlife.ca.gov/Lands/Viewer>, accessed August 30, 2023.

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

**Less Than Significant Impact.** The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

No water bodies or state and federally protected wetlands exist on the Project Site.<sup>40</sup> The closest water feature is Echo Lake, which is classified as a Freshwater Pond and a small portion as Freshwater Emergent Wetland, approximately 3,000 feet west of the Site.<sup>41</sup>

As such, the Project would not 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, and impacts would be less than significant.

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

**Less Than Significant Impact.** The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors.

Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.<sup>42,43</sup>

The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).<sup>44</sup> Existing trees on the Site will be removed to allow for construction of the Project. As discussed above, pursuant to **Mitigation Measure MM-BIO-1**, as outlined under Biological Resources, Threshold (a), tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a qualified biologist would be present during the removal activities to ensure that no active nests would be impacted. If active

40 United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 30, 2023.

41 U.S. Fish and Wildlife Service, NWI, [www.fws.gov/wetlands/data/Mapper.html](http://www.fws.gov/wetlands/data/Mapper.html), accessed August 30, 2023.

42 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3.

43 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015: <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>, accessed August 30, 2023.

44 [Plans](#), KTG Architecture and Planning, February 6, 2024.

nests are found, a buffer would be established until determined by the biologist to no longer be active. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist.

Adherence to these requirements would ensure that the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant.

**e) Would the project 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)?**

**Less Than Significant.** The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, adopted February 4, 2021) (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches in diameter at 4.5 feet above the ground level at the base of the tree or shrub.<sup>45</sup> The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.<sup>46</sup> Therefore, there is nothing onsite that constitutes a protected tree or shrub per City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.<sup>47</sup>

The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).<sup>48</sup> As this is greater than the 82 on-site trees (4 trees per unit) required by LAMC Section 12.21 G.2(a)(3), the Project will not be required to utilize the provisions of Ordinance No. 185,573 to pay an in-lieu fee instead of providing a compliant number of on-site trees.

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard, which are not subject to the City's Protected Tree Ordinance but are subject to the City's street tree regulations, including the provisions of LAMC Section 62.169 that prohibit the removal, destruction, pruning, or injury to any street tree without first obtaining approval from the City's

<sup>45</sup> Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

<sup>46</sup> Protected Tree Report, JTL Consultants, August 31, 2023.

<sup>47</sup> LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

<sup>48</sup> Plans, KTG Architecture and Planning, February 6, 2024.

Urban Forestry Division and/or the Board of Public Works. As described above, to ensure that the existing street trees will be protected during Project construction activities, **PDF-BIO-1** has been incorporated into the Project.

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

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

**No Impact.** The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

As previously described, the Project Site does not support any known habitat or natural community.

There are no Habitat Conservation Plans near the Site.<sup>49</sup>

There are no California Natural Community Conservation Plans (CNCCP) in the area. The only CNCCP in LA County is in the City of Rancho Palos Verdes.<sup>50</sup>

Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.<sup>51</sup>

Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

### Cumulative Impacts

**Less Than Significant Impact.** Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located within the vicinity of the Project Site. There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>52</sup>

<sup>49</sup> USFWS, Habitat Conservation Plans: <https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP>, accessed August 30, 2023.

<sup>50</sup> California Natural Community Conservation Plans, April 2019, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 30, 2023.

<sup>51</sup> California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

<sup>52</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

Neither the Project Site nor any of the Related Projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur.

As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the Related Projects would comply with applicable regulatory requirements and mitigation measures regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. As such, no significant cumulative impacts regarding biological resources would occur.

## 1.5 Cultural Resources

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

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

**D-1** Historical Resources Technical Report, GPA, June 2023

**D-2** CHRIS Records Search, South Central Coastal Information Center, July 27, 2015

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.
- b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.
- c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding

or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:

- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior’s Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.
  - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.
- d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior’s Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.
- e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.

- f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.
- g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.
- h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.
- i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of

archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

- j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS
- k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated.
- l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.

### ***Applicability to the Project***

Consistent with **PMM CULT-1(a)**, a record search of the South Central Coastal Information Center (SCCIC) was conducted on July 27, 2015 to determine if the Project area has been previously surveyed and whether historical resources were identified. In addition, consistent with **PMM CULT-1(b)**, a Historical Resources Technical Report of the Project Site and surrounding properties was prepared by GPA in June 2023, which is included as **Appendix D** of this SCEA. As described below, the Historical Resources Technical Report concluded that no significant impacts to historic resources would occur as a result of the Project.

In addition, consistent with **Mitigation Measure PMM CULT-1(f)**, a CHRIS record search was conducted through the SCCIC, which identified no archaeological sites within the Project Site (refer to Response to Checklist Question 5.b, for a summary of records search findings). Since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project. Therefore, the City's standard Condition of Approval would be implemented to address the inadvertent discovery of archaeological resources. This Condition of Approval is equal to or more effective than relevant measures included in **Mitigation Measure PMM CULT-1**. Thus, overall, the measures outlined in **Mitigation Measure PMM CULT-1** are not applicable to the Project.

**PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.
- b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:
  - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available.
  - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist,

if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.

### ***Applicability to the Project***

**Mitigation Measure PMM CULT-2** is not incorporated into the Project as the City’s standard Condition of Approval regarding the inadvertent discovery of tribal cultural resources during construction would be applied, as outlined under Checklist Section 18, Tribal Cultural Resources, below. This Condition of Approval has been determined to be equal to or more effective than the measures included in **Mitigation Measure PMM CULT-2**. Thus, **Mitigation Measure PMM CULT-2** is not applicable to the Project.

### **Impact Analysis**

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

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

#### **On-Site Resources (Direct Impacts)**

As discussed in Section 3, Project Description, of this SCEA, the Project Site is vacant and undeveloped.

A records search was conducted for the Project area by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton to identify previously recorded prehistoric and historic resources in and around the Project Site (see **Appendix D-2** of this SCEA). The records search includes a review of all recorded archeological sites within a 0.5-mile radius of the Project Site as well as a review of cultural resource reports on file. The California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historic Places, California State Historic Resources Inventory, and City of Los Angeles Historic-Cultural Monuments (HCM) listings were also reviewed for the Project Site. The records search indicates that there are no historic resources located on-site.

The threshold for determining significant impacts on historical resources in the State CEQA Guidelines is whether the proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resources is materially impaired. As described in the Historical Resources Technical Report, included as **Appendix D-1** of this SCEA,

since there are no existing buildings on the Project Site, the Project would have no direct impacts on historical resources.

Therefore, potential direct impacts to historic resources as a result of development of the Project would be less than significant.

### **Off-Site Resources (Indirect Impacts)**

There are five previously identified historical resources in the vicinity of the Project site:

- Angelino Heights Historic Preservation Overlay Zone (HPOZ), 275 feet west of the Site with frontage along Kensington Road<sup>53</sup>
- Restovich House (1001 Everett Street)<sup>54</sup>, 160 feet northeast of the Site
- Metropolitan Water District Complex (1111 Sunset Boulevard), 200 feet south of the Site
- Sunset Streetcar Mixed-Use Historic District (1282-1298 Sunset Boulevard), 340 feet northwest of the Site
- Sunset-East Kensington Public Stairways (1302 Sunset Boulevard and 1270 Sunset Boulevard), 235 feet northwest of the Site

The indirect impacts from the Project were also analyzed. It was concluded that the Project would have no impact on the identified historical resources in the vicinity. The proposed new buildings would introduce a new visual element to the broader context of the identified historical resources; however, the Project would not alter any of the physical characteristics that convey their significance and justify their eligibility as historical resources defined by CEQA. The historical resources would not be materially impaired by the Project.

No other historic resources would be demolished, altered, rehabilitated, converted, or relocated by the Project. No other historic resource has the potential to be adversely affected by the new construction or by excavation and construction activity. Therefore, potential indirect impacts to historic resources as a result of development of the Project would be less than significant.

Based on the above, the Project would not result in a substantial adverse change to the immediate surroundings of nearby historic resources, to the degree that they would no longer be eligible for listing under national, state, or local landmark or historic district programs. As such, impacts would be less than significant, and no mitigation measures are required.

### **b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?**

**Less Than Significant Impact.** 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,

<sup>53</sup> <https://planning.lacity.org/preservation-design/overlays/angelino-heights>

<sup>54</sup> <http://historicplacesla.org/reports/3a404d67-7135-4b3b-9035-473dc7162687>

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.

The Project Site is located within an urbanized area of the City and has been subject to grading, excavation and fill activities, and development in the past. A records search prepared by the South Central Coastal Information Center, included as **Appendix D-2** of this SCEA, included a search of the Project Site and a 0.5-mile radius. The results of the records search identified no archaeological resources on the Project Site.

As previously described, the Project would involve excavation of the Project Site up to 62 feet below ground surface (bgs) for the proposed subterranean parking level, foundation elements, and grading of soils for the worse-case under the descending slope in the northeast corner of the Site.<sup>55</sup> Because the Project Site has undergone previous development, any new archaeological survey is unlikely to observe surface artifacts. Nevertheless, since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project.

The City has established a standard condition of approval to address the inadvertent discovery of archaeological resources, as follows:

- Should archeological resources be inadvertently encountered during ground-disturbing activities, such activities shall be temporarily halted so the find can be evaluated by the project's qualified archaeologist. The archaeologist shall assess any discovered material(s) and prepare a survey, study or report evaluating the impact and recommending appropriate actions in accordance with the regulatory requirements set forth in Public Resources Code Section 21083.2. The applicant shall comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological evaluation report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

Overall, with adherence to the City's Condition of Approval regarding archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5. Impacts would be less than significant.

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

**Less Than Significant Impact.** As discussed above, the Project Site has been subject to previous grading and development. No known traditional burial sites have been identified on-site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. In addition, as outlined under Checklist Section

<sup>55</sup> Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

18, Tribal Cultural Resources, if the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5(c)) and adhere to the City's standard mitigation measures, as outlined under Checklist Section 18, Tribal Cultural Resources.

With the implementation of regulatory requirements, potential impacts associated with the disturbance of human remains, including those interred outside of dedicated cemeteries, would be less than significant. Also refer to Checklist Section 18, Tribal Cultural Resources, below, regarding the Project's potential impacts to tribal cultural resources.

### Cumulative Impacts

**Less Than Significant Impact.** With regard to historic resources, although impacts tend to be site-specific, cumulative impacts could occur if the Project and Related Projects affected local resources with the same level or type of designation or evaluation, affected other structures located within the same historic district, or involved resources that are significant within the same context as the Project.

There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>56</sup>

Of the nine identified Related Projects, only Related Project Nos. 3, 6, 7, 8, and 9 are in proximity to the Site and/or could potentially share the same viewshed as the Project.

Related Project No. 3 (1013 Everett Street) is located directly adjacent to the north of Restovich House (1001 Everett Street). In connection with the City's CEQA review of this project, no potentially significant impacts to historic resources were identified.<sup>57</sup>

Related Project No. 6 (1274 Sunset Boulevard) is directly adjacent to the south of the Sunset Streetcar Mixed-Use Historic District and directly adjacent north of the Sunset-East Kensington Public Stairway at 1270 Sunset Boulevard. In connection with the City's CEQA review of this project, no potentially significant impacts to historic resources were identified.<sup>58</sup>

Related Project No. 7 (1275 Sunset Boulevard) is directly across Sunset Boulevard from the Sunset Streetcar Mixed-Use Historic District and Sunset-East Kensington Public Stairway. In connection with the City's CEQA review of this project, no potentially significant impacts to historic resources were identified.<sup>59</sup>

<sup>56</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

<sup>57</sup> Case No. ENV-2016-1040-MND.

<sup>58</sup> Case No. ENV-2018-279-CE.

<sup>59</sup> Case No. ENV-2018-7667-CE.

Related Project No. 8 (1111 Sunset Boulevard) is located at the Metropolitan Water District Complex. In connection with the City's CEQA review of this project, no potentially significant impacts to historic resources were identified.<sup>60</sup>

Related Project No. 9 (1251 Sunset Boulevard) is directly adjacent to the southwest of Restovich House (1001 Everett Street) and southeast across Sunset Boulevard from the Sunset Streetcar Mixed-Use Historic District and Sunset-East Kensington Public Stairway. In connection with the City's CEQA review of this project, no potentially significant impacts to historic resources were identified.<sup>61</sup>

As discussed above, the Project would not result in any direct or indirect impacts to historical resources. Furthermore, none of the proximate Related Projects would result in any direct or indirect impacts to historical resources. Additionally, the Project Site is not located within the boundaries of a designated historic district, so there would be no potential to contribute to cumulative impacts on a historic district. Furthermore, the Project would not diminish the number or significant of historical resources of the same property types, as the Project Site does not contain any historical resources. Therefore, Project impacts to historic resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to archaeological resources and human remains, the Project and the Related Projects are located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources and/or human remains are uncovered, each Related Project would be required to comply with applicable regulatory requirements. In addition, as part of the environmental review processes for the Related Projects, it is expected that mitigation measures would be established or the City's standard Condition of Approval regarding inadvertent discovery of archaeological or tribal cultural resources would be applied, as necessary.

Overall, based on the above, cumulative impacts to historical resources, archaeological resources, and human remains would be less than significant and would not be cumulatively considerable.

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<sup>60</sup> Case No. ENV-2018-177-EIR.

<sup>61</sup> Case No. ENV-2018-6635-CE.

# 1.6 Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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"/> |

This section is based on the following item, which is included as **Appendix E** to this SCEA:

**E**     Energy Calculations, CAJA Environmental Services, October 2023

**SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

The 2020–2045 RTP/SCS PEIR MMRP did not identify any mitigation measures specifically regarding Energy. However, **PMM GHG-1**, outlined in Section 8, Greenhouse Gas Emissions, below, identifies measures capable of avoiding or reducing the significant effects of increased residential energy consumption, which in turn results in reduced GHG emissions. The Project will implement various measures contained in **PMM GHG-1**, such as use of energy efficient materials, lighting, and heating and cooling systems, which would serve to reduce the Project’s energy usage.

Specifically, as described in the impact analysis below, the Project would incorporate multiple green building and energy efficiency measures in compliance with CALGreen and the LA Green Building Code. In addition, the Project would provide electric vehicle charging stations and infrastructure as well as bicycle parking spaces in compliance with LAMC requirements.

Collectively, these regulatory compliance measures and project features are equal to or more effective than the relevant measures included under **PMM GHG-1** for reducing residential energy consumption (and associated GHG emissions). Since the Project would comply with existing energy efficiency standards and incorporate energy reduction practices, the Project would not result in a wasteful or inefficient use of energy. Thus, relative to energy, the measures included in **PMM GHG-1** are not incorporated into the Project.

## **Impact Analysis**

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

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

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

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

- a) The project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- c) The effects of the project on peak and base period demands for electricity and other forms of energy;
- d) The degree to which the project complies with existing energy standards;
- e) The effects of the project on energy resources;
- f) The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives.
- g) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
- h) Whether the Project conflicts with adopted energy conservation plans.

The following analysis considers these eight criteria (a through h) in the analysis below.

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

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

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations.

### **Construction**

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of the new buildings, 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 offroad construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As shown in **Table 5.6-1** and as discussed further below, Project construction would consume approximately a total of 137,982 gallons of diesel for on-road equipment, and approximately 106,193 gallons of diesel for off-road equipment.

**Table 5.6-1  
Summary of Energy Use During Construction<sup>a</sup>**

<b>Fuel Type</b>	<b>Quantity</b>
<b>Electricity</b>	
Water Consumption (Dust Control) <sup>b</sup>	5,418 kWh
Construction Temporary Power (Lighting, power tools)	70,560 kWh
<b>Total Electricity</b>	<b>75,978 kWh</b>
<b>Gasoline</b>	
On-Road Construction Equipment	412,242 gallons
Off-Road Construction Equipment	0 gallons
<b>Total Gasoline</b>	<b>412,242 gallons</b>
<b>Diesel</b>	
On-Road Construction Equipment	137,982 gallons
Off-Road Construction Equipment	106,193 gallons
<b>Total Diesel</b>	<b>244,175 gallons</b>
kWh = kilowatt-hour	
Note: Numbers may not add up exactly due to rounding.	
<sup>a</sup> Detailed calculations are provided in <b>Appendix E</b> of this SCEA.	
<sup>b</sup> Energy usage associated with supply and conveyance of water from the source.	

### Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas and/or diesel-powered portable generators, as required. As shown in **Table 5.6-1**, approximately 75,987 kilowatt-hours (kWh) of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Therefore, the use of electricity during project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

### Natural Gas

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

### Transportation Energy

The petroleum-based fuel use summary provided in **Table 5.6-1** represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions. As shown, on and off-road vehicles would consume an

estimated 412,242 gallons of gasoline and approximately 244,175 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.01 percent of the 2024 (construction start year) annual on-road gasoline-related energy consumption<sup>62</sup> and 0.04 percent of the 2024 (construction start year) annual diesel fuel-related energy consumption<sup>63</sup> in Los Angeles County.<sup>64</sup> Note that this represents a conservative approach as the construction would be multi-year.

## Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. The Project would increase electrification by installing space heating, water heating and residential appliances (cooking, clothes dryers) powered by electricity while restaurant cooking will be powered by natural gas. As shown in **Table 5.6-2**, the Project's demand for electricity would be approximately 1,941,475 kWh per year, the Project's demand for natural gas would be 853,649 cf per year, and the Project's demand for gasoline and diesel would be 166,997 and 29,720 gallons per year, respectively.

**Table 5.6-2**  
**Summary of Total Annual Energy Use During Operation<sup>a</sup>**

Source	Project
<b>Electricity</b>	
Building	1,771,660 kWh
Water	169,815 kWh
<b>Total Electricity</b>	<b>1,941,475 kWh</b>
<b>Natural Gas</b>	<b>853,649 cf</b>
<b>Mobile (Transportation)</b>	
Gasoline	166,997 gallons
Diesel	29,720 gallons
<b>Total Transportation Fuel</b>	<b>196,717 gallons</b>
cf = cubic feet kWh = Kilowatt-hour EV = electric vehicle <sup>a</sup> Detailed calculations are provided in <b>Appendix E</b> of this SCEA.	

<sup>62</sup> 10,503,000 gallons of gasoline per day in Los Angeles County projected in 2024. Detailed calculations are provided in **Appendix E** of this SCEA. X 365 days = 3,833,595,000 gallons per year. 412,242 gallons Project construction / 3.833 billion gallons x 100% = 0.01%

<sup>63</sup> 1,684,000 gallons of diesel per day in Los Angeles County projected in 2024. Detailed calculations are provided in **Appendix E** of this SCEA. X 365 days = 614,660,000 gallons per year. 244,175 gallons Project construction / 614,660,000 on gallons x 100% = 0.04%

<sup>64</sup> California Air Resources Board, EMFAC2021 Web Database, [www.arb.ca.gov/emfac](http://www.arb.ca.gov/emfac).

## Electricity

As the Project would comply with Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,941,475 kWh per year (refer to **Table 5.6-2**). Based on LADWP’s 2017 Resource Plan, LADWP forecasts that its total energy sales in the 2027–2028 fiscal year (the Project’s buildout year) will be 24,078 gigawatt hour (GWh) of electricity.<sup>65</sup> As such, the Project-related net increase in annual electricity consumption would represent only approximately 0.008 percent of LADWP’s projected sales in 2027–2028. In addition, LADWP is committed to ensuring the sustainability of its power supply, and is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and at least 50 percent by 2030, which will ensure that projected supplies will be more than sufficient to meet demand.

## Natural Gas

The Southern California Gas Company (SoCal Gas) provides natural gas service to the Project Site vicinity. With compliance of Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project is anticipated to generate an increase in the on-site demand for natural gas totaling approximately 853,649 cubic feet (cf) per year, or approximately 2,339 cf per day. Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas capacity available within SoCal Gas’s planning area will be approximately 2.23 billion cf per day in 2027.<sup>66</sup> The Project would be consistent with the forecasted 2027 consumption in SoCal Gas’s planning area.<sup>67</sup>

## Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As shown in **Table 5.6-2**, the Project’s net demand for gasoline and diesel would be approximately 166,997 and 29,720 gallons per year, respectively. The Project Site is located adjacent to a Job Center, and within a Transit Priority Area (TPA), High Quality Transit Area (HQTA) and a Neighborhood Mobility Area (NMA), as designated by SCAG, which indicates that the Project Site is an appropriate site for increased density and employment opportunities from a “smart growth” regional planning perspective.<sup>68</sup> Extensive public bus service is provided within the Project study area.

The existing transit services in the vicinity of the Project Site would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving.

<sup>65</sup> LADWP, 2017 Final Power Strategic Long-Term Resource Plan.

<sup>66</sup> California Gas and Electric Utilities, 2022 California Gas Report.

<sup>67</sup> Consistent with Ordinance 187,714 the Project will include 853,649 cf/year of natural gas usage for restaurant cooking. The Project’s natural gas consumption would account for approximately 0.0001 percent of the forecasted 2027 consumption in the SoCalGas planning area.

<sup>68</sup> According to the 2020–2045 RTP/SCS an HQTA is a corridor-focused Priority Growth Area (PGA) within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours; an NMA is a PGA with a high number of intersections, low observed travel speed, high mix of uses and high accessibility to “everyday” destinations where complete streets and sustainability policies support and encourage replacing or reducing single and multi-occupant automobile use.

Additionally, the Project would provide bicycle parking areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. These specific transportation demand management measures include reduced parking, pedestrian project enhancements, and bicycle parking. Furthermore, the Project would install EV-ready and EV-equipped parking spaces at the Project Site. As such, operational impacts to transportation energy would be less than significant.

- b. 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 during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents far less than the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities. Thus, there would be no demand generated by construction. Transportation fuel usage during Project construction activities would represent approximately 0.01 percent of gasoline usage and approximately 0.04 percent of diesel usage within Los Angeles County, respectively.<sup>69</sup> As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption during the construction period.

### **Operation**

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2026–2027 fiscal year (the Project's buildout year) will be 24,078 GWh of electricity.<sup>70</sup> As such, the Project-related net increase in annual electricity consumption of 4,049,481 kWh per year would represent approximately 0.02 percent of LADWP's projected sales in 2027. Furthermore, LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area (Appendix I of the Strategic Long-Term Resources Plan).

Based on the 2022 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCal Gas's planning area will be approximately 2.23 billion cf

<sup>69</sup> California Air Resources Board, EMFAC2021 Web Database, [www.arb.ca.gov/emfac](http://www.arb.ca.gov/emfac)

<sup>70</sup> LADWP, 2017 Final Power Strategic Long-Term Resource Plan.

per day in 2027.<sup>71</sup> The Project would be consistent with the forecasted 2027 consumption in SoCal Gas's planning area.

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

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.3 percent would be sufficient to account for future electrical demand by the Project.<sup>72</sup> Therefore, Project electricity consumption during operational activities would have a negligible effect on load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area). In addition, construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.<sup>73</sup> Electricity and Natural Gas usage during Project operations would comply with Title 24 standards and applicable CalGreen requirements and Los Angeles Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

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

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

*e. Effects of the Project on Energy Resources*

LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal wind and hydropower. The LADWP's most recently

<sup>71</sup> California Gas and Electric Utilities, 2022 California Gas Report.

<sup>72</sup> LADWP, 2018 Retail Electric Sales and Demand Forecast.

<sup>73</sup> Energy Independence and Security Act of 2007, Public Law 110-140.

adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.<sup>74</sup> According to the U.S. Energy Information Administration (EIA), the United States currently has over 86 years of natural gas reserves.<sup>75</sup> Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet consumption through 2050.<sup>76</sup> The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 35 percent of LADWP's overall energy mix in 2021, the most recent year for which data are available.<sup>77</sup> This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, methane, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.<sup>78</sup>

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

As discussed above, the Project would include project features to reduce VMT during operational activities. The Project's high-density design and location in proximity to job centers and retail uses

<sup>74</sup> California Gas and Electric Utilities, 2020 California Gas Report.

<sup>75</sup> U.S. Energy Information Administration, Frequently Asked Questions, [www.eia.gov/tools/faqs/faq.php?id=58&t=8](http://www.eia.gov/tools/faqs/faq.php?id=58&t=8), accessed August 30, 2023.

<sup>76</sup> U.S. Energy Information Administration, Frequently Asked Questions, [www.eia.gov/tools/faqs/faq.php?id=38&t=6](http://www.eia.gov/tools/faqs/faq.php?id=38&t=6), accessed August 30, 2023.

<sup>77</sup> LADWP Annual Power Content Labels for 2021, [https://www.ladwp.com/ladwp/faces/wcnav\\_externalId/a-p-pwr-cntnt-labl?\\_afLoop=426169461995376&\\_afWindowMode=0&\\_afWindowId=null#%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D426169461995376%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3Dq1qm2hwut\\_4](https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-pwr-cntnt-labl?_afLoop=426169461995376&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D426169461995376%26_afWindowMode%3D0%26_adf.ctrl-state%3Dq1qm2hwut_4), accessed August 30, 2023.

<sup>78</sup> California Energy Commission, Systems Assessment & Facilities Siting Division Cartography Unit, California Wind Resource Potential Map.

would allow for residents to live closer to services and shopping areas, reducing VMT. The Project design, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also encourages non-automotive forms of transportation such as walking or biking to destinations. In addition, the Project would be located in close proximity to multiple existing and future transit stops. Therefore, the Project would encourage the use of efficient transportation alternatives.

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

The current City of LA Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements. This includes many of the measures outlined in SCAG's **PMM GHG-1**. While this mitigation measure serves to reduce the Project's GHG emissions, measures contained in **PMM GHG-1** such as use of energy efficient materials, lighting and heating and cooling systems, would also serve to reduce the Project's energy usage.

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

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

*h. Whether the Project conflict with adopted energy conservation plans*

As discussed under Checklist Section 8, Greenhouse Gas Emissions, the City has published its LA Green Plan/ClimateLA in 2007 as well as the Green New Deal in 2020, which outline goals and actions by the City to reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2022 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and under Item XI, Land Use and Planning, SCAG's 2020–2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility,

economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources.

The Project would be consistent with the energy efficiency policies emphasized in the 2020–2045 RTP/SCS. Most notably, the Project would be an infill mixed-use development developed within an HQTAs, TPAs, and NMAs and adjacent to a Job Center. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation, including Metro and LADOT bus lines. The introduction of new housing and job opportunities within an HQTAs, as proposed by the Project, is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new housing and jobs near transit. The 2020–2045 RTP/SCS would result in an estimated 19 percent decrease in VMT by 2035. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals (i.e., SB 375 goal).

Thus, consistent with the 2020–2045 RTP/SCS, the Project would result in an approximately 16.5-percent reduction in VMT from mobile sources in comparison to a Project without reduction measures (e.g., density and proximity to transit, TDM measures such as reduced parking supply in accordance with AB 2097, unbundled cost of parking from residential leases, promotions and parking program on transportation options, and bicycle parking per LAMC), and, consequently, the Project’s petroleum-based fuel usage would be reduced.<sup>79</sup> In addition, the Project would comply with state energy efficiency requirements, and would use electricity from LADWP, which has a current renewable energy mix of 35 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

## Conclusion

As demonstrated in the analysis above, the Project’s energy requirements would not significantly affect local and regional supplies or capacity. The Project’s energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During construction the Project would comply with Title 24 energy efficiency standards where applicable resulting in efficient use of energy. During operations, the Project would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements.

Thus, overall, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation, and impacts would be less than significant.

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<sup>79</sup> The LADOT VMT Calculator incorporates the USEPA MXD model and accounts for project features such as increased density and proximity to transit, which would reduce VMT and associated fuel usage in comparison to free-standing sites. 13,934 VMT screening summary compared to 11,632 VMT analysis = 16.5% reduction. [Transportation Assessment](#), Fehr & Peers, October 2023.

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

**Less Than Significant Impact.** With regard to Energy Threshold (b) the Project was evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CalGreen and City building codes. Also, as discussed under Checklist Section 8, Greenhouse Gas Emissions, of this SCEA, the Project would also be consistent with the SCAG RTP/SCS which includes goals to reduce VMT and corresponding decrease in fuel consumption.

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

The City of Los Angeles adopted and released the City's first ever Sustainable City pLAN, which set short-term and long-term energy and conservation targets geared towards advancing the City's economy and equity. In 2019, the City of Los Angeles prepared the 2019 Green New Deal, which provided an expanded vision of the pLAN, focusing on securing clean air and water and a stable climate, improving community resilience, expanding access to healthy food and open space, and promoting environmental justice for all. Through the Green New Deal, the City would cut an additional 30 percent in GHG emissions above and beyond the 2015 pLAN to ensure that the City stays within its carbon budget between now (2022) and 2050.<sup>80</sup> A consistency analysis is provided under Checklist Section 8, Greenhouse Gas Emissions, which outlines specific policies of the Green New Deal that the Project would be consistent with. To summarize, the Project would be required to comply with the Title 24 standards for Energy Efficiency and Conservation that are in effect at the time of development. In addition, per compliance with the California Energy Code, the Project would allocate roof area for future solar panels.

Incorporation of these design features, combined with compliance with regulatory standards, would ensure that the Project would not conflict with energy and conservation measures provided by the state or City, and as such, impacts would be less than significant.

<sup>80</sup> City of Los Angeles, L.A.'s Green New Deal Sustainable City pLAN 2019.

## Cumulative Impacts

**Less Than Significant Impact.** The geographic context for the cumulative impacts analysis regarding electricity is LADWP's service area and the geographic context for the cumulative impacts analysis regarding natural gas is the SoCal Gas service area. The City has determined to assess the Project's potential cumulative impacts in the context of County-wide consumption. Growth within these geographic areas is anticipated to increase the demand for energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

As described above, the Project would comply with existing energy standards, would be consistent with adopted energy conservation plans, and would not result in wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation. Therefore, the Project's contribution to cumulative impacts related to energy consumption would not result in a cumulatively considerable effect related to the wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the Project's impacts would not be cumulatively considerable and cumulative energy impacts would be less than significant.

## 1.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<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 type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 181B 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**F-1** Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023

**F-2** Soils Review Letter, Los Angeles Department of Building and Safety, October 17, 2023

**F-3** Response Letter, Geotechnologies, December 6, 2023

- F-4 Supplemental Geotechnical Engineering Investigation, Geotechnologies, December 7, 2023
- F-5 Soils Review Letter, Los Angeles Department of Building and Safety, January 16, 2024
- F-6 Response Letter, Geotechnologies, January 26, 2024
- F-7 Soils Approval Letter, Los Angeles Department of Building and Safety, February 12, 2024
- F-8 Paleontological Resources, Natural History Museum, October 22, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- 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.
- b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program.
- c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.

- d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.

### ***Applicability to the Project***

Consistent with **PMM GEO-1(a)**, a geotechnical investigation was prepared for the Project, which includes site-specific recommendations for the geologic and soil conditions of the Project Site. Furthermore, the Project would be required to comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would be required to provide a final design-level geotechnical report, subject to Los Angeles Department of Building and Safety (LADBS) review and approval, prior to the issuance of grading and building permits for the Project. In addition, the Project would be required to comply with existing City and state regulations regarding erosion control, drainage, and stormwater management.

Compliance with existing regulatory requirements would be equal to or more effective than the measures included in **PMM GEO-1** as the Project would be required to incorporate site-specific geotechnical recommendations for increasing safety and reducing geologic hazards, and the proposed Project building would be constructed in accordance with all City-required geotechnical requirements. In addition, as analyzed below, the Project would not result in potentially significant impacts regarding geology and soils issues that would require mitigation. As such, **PMM GEO-1** is not applicable to the Project.

**PMM GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources.
- b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum

records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface.

- c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
  - 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.
  - 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 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.
  - 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.
  - 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.
- e) Avoid routes and project designs that would permanently alter unique geological features.
- f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

- 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.
- 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.

### ***Applicability to the Project***

As analyzed below, no known paleontological resources have been identified at the Project Site. Notwithstanding, to avoid potential impacts due to the inadvertent discovery of paleontological resources during the Project's grading and excavation period, the Project would implement the City's standard Condition of Approval, which is equal to or more effective than the relevant measures included in **PMM GEO-2**. Thus, **PMM GEO-2** is not applicable to the Project.

### **Impact Analysis**

- a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
  - i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less Than Significant Impact.** Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are 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 California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to

prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Preliminary Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.<sup>81</sup>

Based on a review of the City's ZIMAS system, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Preliminary Fault Rupture Study Area, and no known active faults underlie the Project Site.<sup>82</sup>

According to the California Department of Conservation, the Project Site is not located within an earthquake fault zone.<sup>83</sup>

The closest active fault to the Project Site is the Hollywood Fault, located approximately 3.5 miles northwest of the Project Site.<sup>84</sup>

Based on research of available literature and results of site reconnaissance, no known active or potentially active faults underlie the Project Site. In addition, the Project Site is not located within an Earthquake Fault Zone. Based on these considerations, the potential for surface rupture at the subject site is considered low.<sup>85</sup>

Furthermore, while the Project would involve excavation of up to 62 feet below grade surface (bgs) for the subterranean parking level for the worse-case under the descending slope in the northeast corner of the Site<sup>86</sup>, the proposed development would not involve mining operations or deep excavation into the earth, which could create unstable seismic conditions or stresses in the Earth's crust. Nevertheless, the Project would comply with the existing seismic and grading design regulations required by the City of Los Angeles Building Code and would provide a final design-level geotechnical report, subject to LADBS review and approval, prior to the issuance of grading permits for the Project.

LADBS reviewed the Updated Geotechnical Engineering Investigation dated September 6, 2023, the Supplemental Geotechnical Engineering Investigation dated December 7, 2023, and the Response Letter dated January 26, 2024 and issued an approval letter, included as **Appendix F-7** of this SCEA.<sup>87</sup>

Compliance with existing City regulatory requirements would further ensure that the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to rupture of a known earthquake fault. Impacts would be less than significant.

81 City of Los Angeles, Alquist-Priolo Earthquake Fault Zones, <https://geohub.lacity.org/datasets/alquist-priolo-earthquake-fault-zones/explore?location=34.071617%2C-118.251232%2C14.00>, accessed August 30, 2023.

82 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

83 California Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/>, accessed August 30, 2023.

84 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

85 Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

86 Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

87 Soils Approval Letter, Los Angeles Department of Building and Safety, February 12, 2024.

## ii. Strong seismic ground shaking?

**Less Than Significant Impact.** The Project Site is located in the seismically active Southern California region, which generally experiences moderate to strong ground shaking in the event of an earthquake on a local or regional fault. However, as noted above, no active faults are known to pass directly beneath the Project Site and therefore, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to strong seismic ground shaking.

In addition, the Project would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions such as strong seismic ground shaking. Therefore, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions.

Additionally, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. Specifically, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety.

LADBS is responsible for implementing the provisions of the Los Angeles Building Code, and the Project would be required to comply with the plan review and permitting requirements of LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to review and approval by LADBS.

The geotechnical report would include the recommendations that would be enforced by the LADBS for the construction of the Project.

In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, and the City's General Plan Safety Element.

Therefore, based on the above, through compliance with regulatory requirements, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking. Thus, impacts related to exposure to strong seismic ground shaking would be less than significant.

## iii. Seismic-related ground failure, including liquefaction?

**No Impact.** Liquefaction occurs when loose, relatively cohesionless soils lose their strength due to excess water pressure that builds up during repeated movement from seismic activity. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Factors that contribute

to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. The effects of liquefaction include the loss of the soil's ability to support footings and foundations which may cause buildings and foundations to buckle.

According to the California Department of Conservation's Seismic Hazard Zone Map for the Hollywood Quadrangle, the Project Site is not located within a liquefaction hazard zone.<sup>88</sup>

Based on a review of the City's ZIMAS system, the Project Site is not within a liquefaction zone.<sup>89</sup>

According to the California Department of Conservation, the Project Site is not located within a liquefaction zone.<sup>90</sup>

The City's Local Hazard Mitigation Plan also indicates that the Project Site is not located within a liquefaction zone.<sup>91</sup>

The site is not in a potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. The proposed structure will be supported in the siltstone bedrock of the Puente Formation. This rock will not liquefy due to its moderately hard consistency and its long tectonic history.<sup>92</sup>

Based on the above, the Project would not directly or indirectly cause or exacerbate potential substantial adverse effects, including the risk of loss, injury, or death related to seismic-related ground failure, including liquefaction. Therefore, no impact would occur.

#### iv. Landslides?

**No Impact.** Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is located within an urban area. The Project Site is not located in a landslide area as mapped by the State of California.<sup>93</sup> Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.<sup>94,95</sup>

88 California Department of Conservation, California Geological Survey, State of California Seismic Hazards Zones Map, Hollywood 7.5 Minute Quadrangle.

89 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

90 California Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/>, accessed August 30, 2023.

91 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 9-16, East Los Angeles APC Liquefaction Zones, p. 9-23: [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed August 30, 2023.

92 Page 14, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

93 California Geological Survey, Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/app/>, accessed August 30, 2023.

94 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 11-7, Landslide Hazard Areas in the East Los Angeles APC, p. 11-8: [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed August 30, 2023.

95 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

There are no known landslides near the Project Site, and the Project Site is not in the path of any known or potential landslides. The Project Site's existing topography would not be substantially altered by the Project and development of the Project would not cause landslides.

The bedding orientation on the west-facing slope is neutral to favorable with respect to the slope face with respect to slope stability. Therefore, the potential for landsliding is very low.<sup>96</sup> Moreover, a stability analysis prepared for the Project indicates that the Site's existing slope with proposed improvements has a factor of safety in excess of LADBS requirements.<sup>97</sup>

As such, the Project would not exacerbate existing conditions that would directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides, and no impact would occur.

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

**Less Than Significant Impact.** The Project Site is vacant and undeveloped. As such, there are extensive open spaces with exposed topsoil. In addition, construction of the Project would require grading, excavation associated with the installation of building footings and subterranean parking, and other construction activities that have the potential to disturb soils underneath the Project Site and expose these soils to rainfall and wind, which can result in soil erosion.

However, this potential soil erosion would be reduced by the implementation of standard erosion controls during site preparation and grading activities. Specifically, all grading activities would require grading permits from the Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels.

In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavation, and fills. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance and implement standard erosion controls to limit stormwater runoff, which can contribute to erosion. Regarding soil erosion during Project operations, the potential is negligible since the Project Site would mostly remain fully developed, except for some landscaping located throughout the Project Site. However, the landscaping would include trees to prevent soil erosion.

Therefore, with compliance with applicable regulatory requirements, the Project would not result in substantial soil erosion or the loss of topsoil during construction or operation. Impacts would be less than significant.

**c) Would the project 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?**

<sup>96</sup> Page 15, [Updated Geotechnical Engineering Investigation](#), Geotechnologies, September 6, 2023.

<sup>97</sup> Page 19, [Updated Geotechnical Engineering Investigation](#), Geotechnologies, September 6, 2023.

**Less Than Significant Impact.** As discussed above, the Project Site would not result in or exacerbate on or off-site landsliding or slope stability issues. Therefore, no impacts related to landslides would occur.

Topographic relief across the Site is as much as 95 feet. The Project design takes into account the slope topography of the Site. The building massing has been carefully stepped into the hillside and terraces back to the northeast corner of the Site.

As previously discussed, liquefaction-related effects include lateral spreading, which refers to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement. The Project Site is not susceptible to liquefaction and would not potentially result in or exacerbate lateral spreading. Therefore, impacts related to lateral spreading would be less than significant.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. No large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general vicinity of the Project Site. Therefore, there is minimal to no potential for ground subsidence due to withdrawal of fluid or gas at the Project Site. Thus, the potential for subsidence is considered low.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.

Due to the moderately hard consistency of the bedrock, the potential for lateral spreading is remote.<sup>98</sup>

Due to the moderately hard consistency of the bedrock, the potential for dynamic dry settlement is considered remote.<sup>99</sup>

Therefore, the Project Site is not 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 collapse. Impacts associated with collapsible soils would be less than significant.

Overall, based on the above, impacts associated with liquefaction, landslides, lateral spreading, subsidence, and collapsible soils would be less than significant and no mitigation would be required

**d) Would the project be located on expansive soil, as defined in Table 181B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less Than Significant Impact.** Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Due

<sup>98</sup> Page 14, [Updated Geotechnical Engineering Investigation](#), Geotechnologies, September 6, 2023.

<sup>99</sup> Page 14, [Updated Geotechnical Engineering Investigation](#), Geotechnologies, September 6, 2023.

to high clay content, expansive soils expand with the addition of water and shrink when dried, which can cause damage to overlying structures.

The onsite geologic materials are in the moderate to high expansion range. Reinforcing beyond the minimum required by the City of Los Angeles Department of Building and Safety is not required.<sup>100</sup>

Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles through the building permit process. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design-level Geotechnical Investigation required by the City.

Therefore, the Project would not create substantial direct or indirect risks to life or property with regard to expansive soil, and impacts would be less than significant.

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

**No Impact.** The Project Site is served by existing wastewater infrastructure, and the Project's wastewater demand would be accommodated by connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems.

No impact related to the use of septic tanks or alternative wastewater disposal systems would occur.

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

**Less than Significant Impact.**

### **Geologic Features**

Topographic relief across the Site is as much as 95 feet. There are no other distinct and prominent geologic or topographic features (i.e., hilltops, ridges, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site. The Project design takes into account the slope topography of the Site. The building massing has been carefully stepped into the hillside and terraces back to the northeast corner of the Site. Thus, the Project would not destroy any distinct and prominent geologic or topographic features and no impacts would occur.

### **Paleontological Resources**

Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the

<sup>100</sup> Page 25, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

majority of species that have existed on earth from this era are extinct. Public Resources Code Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

The Project Site is located within an urbanized area and has been subject to repeated grading and development in the past. Thus, surficial paleontological resources that may have existed at one time have likely been previously disturbed. A Project-specific paleontological records search for the Project Site was conducted by the Natural History Museum of Los Angeles County, October 22, 2023, which is included as **Appendix F-8** of this SCEA. As outlined therein, there are no previously encountered fossil vertebrate finds located within the Project Site. However, according to the records search, vertebrate fossil localities have been discovered nearby from the same sedimentary deposits that occur on the Project Site either at the surface or at depth.

As outlined in the paleontological records search, surface deposits and bedrock in the entire Project Site area consist of the Puente Formation which provided fossils at depths of 60 feet bgs and some at unknown depths.<sup>101</sup>

It is unlikely that very shallow excavations in the deposits underlying the Project Site are to uncover significant vertebrate deposits. Nevertheless, as the Project would include excavations up to a maximum depth of up to 62 feet bgs, the possibility exists that paleontological artifacts that were not discovered during prior construction or other human activity may be present.

The City of Los Angeles has established a standard Condition of Approval to address inadvertent discovery of paleontological resources, as provided below:

- If a probable paleontological resource is uncovered at the Project site during ground disturbance activities or construction, all work shall cease within an appropriate radius of the find, as determined by a Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) standards for a Principal Investigator or Project Paleontologist, who shall be retained by the project applicant to evaluate the find in accordance with the SVP's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological resources that are uncovered shall not be moved or collected by anyone other than the Qualified Paleontologist or their designated representative (such as a Qualified Monitor) and shall be treated in accordance with the SVP's Standard Procedures. The Qualified Paleontologist shall prepare a report in accordance with current professional standards that describes the resource and its disposition, as well as the assessment methodology, for submittal to the City of Los Angeles Department of City Planning (DCP) and the Natural History Museum of Los Angeles County. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los

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<sup>101</sup> [Paleontological Resources](#), Natural History Museum, October 22, 2023.

Angeles County, with which the Applicant must comply.

Following the inadvertent discovery, the Qualified Paleontologist shall perform and/or oversee periodic monitoring of all ground disturbance activities within those areas of the project site identified as having a moderate to high potential for paleontological resources in order to identify any additional resources and avoid potential impacts to such resources. The area and frequency of inspections shall be determined by the Qualified Paleontologist, depending on the paleontological sensitivity of the sediments and/or rocks being excavated, the rate of excavation and grading activities, and, if found, the abundance and type of fossils encountered. Ground disturbance activities may resume in the area of the find once the Qualified Paleontologist's recommendations have been implemented to the satisfaction of the Qualified Paleontologist.

Overall, the Project would not directly or indirectly destroy a unique geologic feature and, with implementation of the City's standard Condition of Approval, would not directly or indirectly destroy a unique paleontological resource. Thus, impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), impacts associated with geology and soils are generally evaluated within the context of each individual project rather than on a cumulative basis. Nonetheless, cumulative growth in the surrounding area (inclusive of the Project and the nine Related Projects) would expose a greater number of people to seismic hazards. However, as with the Project, Related Projects and other future development project would be required to comply with existing regulatory requirements and the City's grading permit review and approval process, as well as site-specific geotechnical evaluations that would identify potential effects related to the underlying geologic and soil conditions for a particular Related Project site.

In addition, in the event that paleontological resources are uncovered, each Related Project would be required to comply with the applicable regulatory requirements, and the City's standard Condition of Approval regarding inadvertent discovery of paleontological resources would apply.

Therefore, cumulative impacts related to geology and soils (including paleontological resources) would not be cumulatively considerable and cumulative impacts would be less than significant.

# 1.8 Greenhouse Gas Emissions

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

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

This section is based on the following item, which is included as **Appendix G** to this SCEA:

**G** Greenhouse Gas Technical Report and Technical Appendix, DKA Planning, October 2023

## SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:
  - i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
  - ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.
  - iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
  - iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment.
  - v. Use high-efficiency lighting and cooking devices.

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- vi. Incorporate passive solar design.
  - vii. Use high-reflectivity building materials and multiple glazing.
  - viii. Prohibit gas-powered landscape maintenance equipment.
  - ix. Install electric vehicle charging stations.
  - x. Reduce wood burning stoves or fireplaces.
  - xi. Provide bike lanes accessibility and parking at residential developments.
- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
  - c) Include off-site measures to mitigate a project's emissions.
  - d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
    - i. Use energy and fuel-efficient vehicles and equipment;
    - ii. Deployment of zero and/or near zero emission technologies;
    - iii. Use lighting systems that are energy efficient, such as LED technology;
    - iv. Use the minimum feasible amount of GHG-emitting construction materials;
    - v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
    - vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
    - vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;
    - viii. Incorporate design measures to reduce water consumption;
    - ix. Use lighter-colored pavement where feasible;
    - x. Recycle construction debris to maximum extent feasible;

- xi. Plant shade trees in or near construction projects where feasible; and
  - xii. Solicit bids that include concepts listed above.
- e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:
- i. Promote transit-active transportation coordinated strategies;
  - ii. Increase bicycle carrying capacity on transit and rail vehicles;
  - iii. Improve or increase access to transit;
  - iv. Increase access to common goods and services, such as groceries, schools, and day care;
  - v. Incorporate affordable housing into the project;
  - vi. Incorporate the neighborhood electric vehicle network;
  - vii. Orient the project toward transit, bicycle and pedestrian facilities;
  - viii. Improve pedestrian or bicycle networks, or transit service;
  - ix. Provide traffic calming measures;
  - x. Provide bicycle parking;
  - xi. Limit or eliminate park supply through;
  - xii. Elimination (or reduction) of minimum parking requirements
  - xiii. Creation of maximum parking requirements
  - xiv. Provision of shared parking.
  - xv. Unbundle parking costs;
  - xvi. Provide parking cash-out programs;
  - xvii. Implement or provide access to commute reduction program;
- f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;

- g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and
- h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:
  - i. Provide car-sharing, bike sharing, and ride-sharing programs;
  - ii. Provide transit passes;
  - iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
  - iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
  - v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
  - vi. Provide employee transportation coordinators at employment sites;
  - vii. Provide a guaranteed ride home service to users of non-auto modes.
- i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- j) Land use siting and design measures that reduce GHG emissions, including:
  - i. Developing on infill and brownfields sites;
  - ii. Building compact and mixed-use developments near transit;
  - iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;
  - iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
  - v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

- k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
- l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
- m) Encourage telecommuting and alternative work schedules, such as:
  - i. Staggered starting times
  - ii. Flexible schedules
  - iii. Compressed work weeks
- n) Implement commute trip reduction marketing, such as:
  - i. New employee orientation of trip reduction and alternative mode options
  - ii. Event promotions
  - iii. Publications
- o) Implement preferential parking permit program
- p) Implement school pool and bus programs
- q) Price workplace parking, such as:
  - i. Explicitly charging for parking for its employees;
  - ii. Implementing above market rate pricing;
  - iii. Validating parking only for invited guests;
  - iv. Not providing employee parking and transportation allowances; and
  - v. Educating employees about available alternatives.

### ***Applicability to the Project***

As analyzed below, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen)

that would be consistent with or as effective as the measures included in **PMM GHG-1**. Specifically,

- The Project would integrate green building measures consistent with CalGreen (California Building Code Title 24). Specifically, the Project would comply with Title 24 Standards which ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As discussed above in Section 6, Energy, the Project would include all electric HVAC systems; and Energy Star–labeled all electric appliances in residential areas, or equivalent rating as may be applied at the time of construction.
- Furthermore, all exterior and interior lighting would meet high energy efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. The Project would also set aside a minimum area for potential installation of solar panels on residential and non-residential buildings at a later date as required by Title 24.
- The Project would comply with the City’s EV charging requirements, which exceed Title 24.
- Pursuant to the requirements of Senate Bill (SB) 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Furthermore, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project’s construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility.
- The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.<sup>102</sup> The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling.

In addition, the Project would implement water conservation features required by the City’s current codes and ordinances. The Project would also include TDM strategies including reduced parking supply, promotion and marketing program for transportation options, and the provision of bicycle parking.

The Project would adhere to existing regulatory requirements regarding GHG emissions and the above TDM strategies, which are consistent with or as effective as **PMM GHG-1** in reducing substantial adverse effects related to GHG emissions. As such, **PMM GHG-1** is not applicable to the Project.

### **Impact Analysis**

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

<sup>102</sup> Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

**Less Than Significant Impact.**<sup>103</sup> The City has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions. Nor have SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency adopted a numerical significance threshold for assessing GHG emission that is applicable to the Project. Since there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the analysis focuses on the Project's consistency with statewide, regional and local plans adopted for the purpose of reducing and/or mitigating GHG emissions, as discussed under GHG Threshold (b). The evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG emissions-related impacts on the environment.

Notwithstanding, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions.<sup>104</sup>

The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. However, the significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

The Project would generate direct and indirect GHG emissions because of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing motel uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;

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103 The Less Than Significant Impact determination is based on the analysis included under GHG Threshold (b).

104 Pursuant to California Public Resources Code Sections 21155.2(b)(1) and 21159.28(a), any Project-specific or cumulative GHG-related impacts associated with vehicular and/or truck trips are disclosed for informational (as opposed to impact evaluation) purposes. The SCEA statute specifies that these specific impacts do not need to be discussed or referenced in the SCEA prepared for the Project.

- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon;
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Vegetation: emissions associated with sequestration from tree planting or removal; and
- Refrigerants: These are substances used in equipment for air conditioning and refrigeration. Most refrigerants are HFCs or blends of them, which can have high GWP values.

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

### Construction

GHG emissions from construction activities were forecasted using construction schedule and phasing information provided by the Project applicant and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to **Appendix G** of this SCEA).

The Project includes the construction of a new mixed-use development totaling 321,300 square feet, including 327 residential apartment units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space.

Project construction is anticipated to be completed in 2027 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in the Technical Appendix. The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

As presented in **Table 5.8-1**, construction of the Project is estimated to generate a total of 3,465 metric tons of GHGs measured as an equivalent mass of carbon dioxide (MTCO<sub>2e</sub>). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.<sup>105</sup> This results in annual Project construction emissions of 116 MTCO<sub>2e</sub>.

<sup>105</sup> SCAQMD Governing Board Agenda Item 31, December 5, 2008.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in **Appendix G** of this SCEA.

**Table 5.8-1**  
**Construction-Related GHG Emissions (MTCO<sub>2e</sub>)**

Year	MTCO <sub>2e</sub> <sup>a</sup>
2024	2
2025	1,200
2026	1,519
2027	744
<b>Total</b>	<b>3,465</b>
<b>Amortized Over 30 Years<sup>b</sup></b>	<b>116</b>

MTCO<sub>2e</sub> = metric tons of an equivalent mass of carbon dioxide

<sup>a</sup> CO<sub>2e</sub> was calculated using CalEEMod 2022.1.1.17 and the results are provided in Section 2.3 of the Construction CalEEMod output file within **Appendix G** of this SCEA.

<sup>b</sup> As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

## Operation

The Project would include an increase of residential and commercial uses. This would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements under Title 24 and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT as discussed under Checklist Section 17, Transportation, and in the Transportation Assessment included as **Appendix K-1** of this SCEA. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix D of the Transportation Assessment).

As shown in **Table 5.8-2**, the Project, with implementation of regulatory requirements set forth in Title 24 and Los Angeles Green Building Code, would result in approximately 2,409 MTCO<sub>2e</sub> annually. As pointed out above, there is not an adopted numerical significance threshold for assessing impacts related to GHG emissions. The following analysis, which includes an evaluation of the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reduction GHG emissions, is, therefore, used to determine the significance of the Project's GHG emissions-related impacts on the environment.

**Table 5.8-2**  
**Annual GHG Emissions Summary (Buildout)<sup>a</sup>**  
**(metric tons of carbon dioxide equivalent [MTCO<sub>2e</sub>])**

<b>Year</b>	<b>MTCO<sub>2</sub><sup>a</sup></b>
Area <sup>b</sup>	8
Energy <sup>c</sup> (electricity and natural gas)	605
Mobile	1,536
Solid Waste <sup>d</sup>	95
Water/Wastewater <sup>e</sup>	54
Vegetation	-8
Refrigerants	3
Construction	116
<b>Total Emissions</b>	<b>2,409</b>
<sup>a</sup> CO <sub>2e</sub> was calculated using CalEEMod and the results are provided in the Technical Appendix. <sup>b</sup> Area source emissions are from landscape equipment and other operational equipment only; hearths omitted. <sup>c</sup> Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. <sup>d</sup> Solid waste emissions are calculated based on CalEEMod default solid waste generation rates. <sup>e</sup> Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.	

### Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in **Table 5.8-2**, the Project would result in eight MTCO<sub>2e</sub> per year from area sources.

### Electricity and Natural Gas Generation Emissions

GHG emissions are emitted because of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO<sub>2</sub> and other GHG emissions directly into the atmosphere. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for LADWP were selected in CalEEMod. The carbon intensity ((pounds per megawatt an hour (lbs/MWh)) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also consider SB 350 RPS requirements for renewable energy.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power

by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

The 2022 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water heating, lighting, and insulation for attics and walls. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.<sup>106</sup>

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance Saturation Survey (RASS) studies.<sup>107</sup> The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in **Table 5.8-2**, Project GHG emissions from electricity and natural gas usage would result in a total of 605 MTCO<sub>2e</sub> per year. This reflects the all-electric plan for the residential uses.

### Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates. To calculate daily trips, the number of residential units and amount of building area for the commercial uses were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 11th Edition*.

The Project represents an infill development within an urbanized area that would concentrate residential and commercial uses within an HQTAs.<sup>108</sup> The Project Site is in the dense Sunset

<sup>106</sup> Energy consumption estimates with CalEEMod 2022.1.1.17 are based on the California Energy Commission's 2020 Residential Appliance Saturation Survey (residential uses) and 2021 Commercial Forecast database, both of which reflected the 2019 Title 24 energy efficiency standards. These energy consumption estimates were adjusted to reflect the 2022 Title 24 standards that cumulatively produce a 0.49 percent reduction in electricity use and 0.45 percent reduction in natural gas use when compared to the 2019 standards.

<sup>107</sup> California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.

<sup>108</sup> The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing

Boulevard corridor with proximity to transit opportunities, which would encourage the use of alternative modes of transportation. Residents, workers, and visitors can use public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro’s Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active transportation. In addition, the live/work units will help reduce travel demand.

The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques.<sup>109</sup> These techniques would reduce vehicle trips and VMT associated with the Project relative to the standard ITE trip generation rates, which would result in a comparable reduction in VMT and associated GHG emissions. Techniques applicable to the Project include the following (a brief description of the Project’s relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.
- **CAPCOA Measure LUT-3 – Increase Diversity of Urban and Suburban Developments (Mixed-Use):** The Project would introduce new residential and commercial uses on the Project Site. The increases in land use diversity, including different housing types, on the Project Site would reduce vehicle trips and VMT by encouraging visitors to walk and use non-automotive forms of transportation (i.e., public transit, biking), which would result in corresponding reductions in transportation-related emissions.
- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is in the dense Sunset Boulevard corridor, a regional job center, also easily accessible by public transportation. Access to multiple destinations, and commercial and retail uses in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions because of the Project.
- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The Project would be located near several transit opportunities, including Metro Lines 4 and 60 on Sunset Boulevard, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights)

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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.” Public Resources Code 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.” Also refer to the City’s ZIMAS System regarding the location of the Project Site within a Transit Priority Area.

<sup>109</sup> CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro’s Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region.

- **CAPCOA Measure LUT-9 – Improve Design of Development:** The Project would enhance the pedestrian and bicycle environment through an attractive open space component and improved sidewalk and streetscape, which would enhance walkability in the Project vicinity. The Project would also locate a development with a high level of street access to Sunset Boulevard, which improves street accessibility and connectivity.
- **CAPCOA Measure SDT-2 – Traffic Calming Measures:** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Site are equipped with sidewalks, and several of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

CalEEMod calculates VMT based on the type of land use, trip purpose, and trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in **Table 5.8-2**, the Project GHG emissions from mobile sources would result in a total of 1,536 MTCO<sub>2</sub>e per year. This estimate reflects reductions attributable to the Project’s characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

#### Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA’s AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in **Table 5.8-2**, the Project scenario is expected to result in a total of 95 MTCO<sub>2</sub>e per year from solid waste that accounts for a 50-percent recycling/diversion rate.<sup>110</sup>

#### Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied energy necessary to supply potable water.<sup>111</sup> GHG emissions are then calculated based on the amount of electricity consumed

<sup>110</sup> AB 341 (2012) increased the Statewide waste diversion goal from 50 to 75 percent from baseline rates established by CalRecycle by 2020 and beyond. Further, SB 1383 (2016) requires jurisdictions to reduce 75 percent of organic waste disposal in landfills by 2030.

<sup>111</sup> The intensity factor reflects the average pounds of CO<sub>2</sub>e per megawatt generated by a utility company.

multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2022 California Plumbing Code (which is based on the 2021 Uniform Plumbing Code), 2022 CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

LADWP's programs includes programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2022 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its Landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035.

As shown in **Table 5.8-2**, Project GHG emissions from water/wastewater usage would result in a total of 54 MTCO<sub>2e</sub> per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

### Vegetation

The planting of 83 trees throughout the development will help to sequester carbon emissions. These trees would generally be 24" box trees, which equates to about two inches of diameter at breast height (DBH), or about 4'6" above the ground. These will help to capture and reduce GHG emissions. As illustrated in **Table 5.8-2**, proposed trees would reduce eight MTCO<sub>2e</sub> per year.

### Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in **Table 5.8-2**, the Project scenario is expected to result in a total of three MTCO<sub>2e</sub> per year from use of refrigerants that used HFCs and have high GWP values.

As noted earlier, one approach to demonstrating a project's consistency with GHG plans is to show how a project will reduce its incremental contribution through a Project Without Reduction Features comparison. The analysis in this section includes potential emissions under a Project Without Reduction Features scenario and from the Project at build-out based on actions and mandates in force in 2027.

As shown in **Table 5.8-3**, the emissions for the Project and its associated CARB 2024 Project Without Reduction Features scenario are estimated to be 1,374 and 2,152 MTCO<sub>2e</sub> per year, respectively, which shows the Project would reduce emissions by 31.2 percent from CARB's 2024 Project Without Reduction Features scenario.

**Table 5.8-3**  
**Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans**

Scenario and Source	Project Without Reduction Features Scenario*	As Proposed Scenario	Reduction from Project Without Reduction Features Scenario	Change from Project Without Reduction Features Scenario
Area Sources	8	8	-	0%
Energy Sources	1,043	605	-438	-42%
Mobile Sources	2,188	1,536	-652	-30%
Waste Sources	95	95	-	0%
Water Sources	54	54	-	0%
Vegetation	-8	-8	-	0%
Refrigerants	3	3	-	0%
Construction	116	116	-	0%
<b>Total Emissions</b>	<b>3,499</b>	<b>2,409</b>	<b>-1,090</b>	<b>-31.2%</b>
Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.				
* Project Without Reduction Features scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).				

The analysis in this section uses the 2022 Scoping Plan's statewide goals as one approach to evaluate the Project's incremental contribution to climate change. The methodology is to compare the Project's emissions as proposed to the Project's emissions as if the Project were built using a Project Without Reduction Features approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with project design features to reduce GHG emissions that are not required by state or local code and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its Project Without Reduction Features comparison based on the Scoping Plan is appropriate, because the Project would contribute to statewide GHG emissions reduction goals. Specifically, the Project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, it would eliminate many vehicle trips, because travel to and from the Project Site could be captured by public transit and active transportation instead. Finally, it would attract existing trips on the street network that would divert to the proposed development.

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

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

**Less Than Significant Impact.** As discussed above, in the absence of a quantifiable significant threshold for GHG Threshold (a), the following analysis is used to determine significance levels related to GHG Threshold (a) and GHG Threshold (b).

**Consistency with Applicable Plans and Policies**

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.<sup>112</sup>

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.<sup>113</sup> The 2008 Scoping Plan proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”<sup>114</sup> The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.<sup>115</sup>

112 Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

113 Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

114 Climate Change Scoping Plan, CARB, December 2008, <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2008-scoping-plan-documents>, last reviewed April 3, 2013, accessed August 30, 2023.

115 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target (2017 Update)*.<sup>116</sup> The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state’s largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.<sup>117</sup>

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.<sup>118</sup> The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor’s Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

The California Attorney General’s Office has taken an active role in addressing climate change in CEQA documents. The Attorney General’s Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.<sup>119</sup> The Attorney General’s Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that “local agencies will help to move the State away from ‘business-as-usual’ and toward a low-carbon future.” The Fact Sheet explains that the listed “measures can be included as design features of a project,” but emphasizes that they “should not be considered in

116 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target, November 2017.

117 CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California’s 2030 Greenhouse Gas Target, November 2017, p. 6.

118 CARB, California’s 2017 Climate Change Scoping Plan, 2017, [ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](http://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf).

119 California Attorney General’s Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming.”

The Governor’s Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a “lifecycle” analysis is required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer’s Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.<sup>120</sup> The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA’s requirements for cumulative impact analyses.<sup>121</sup>

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its “careful judgment” in making a determination of significance, and should make a “good-faith” effort to “describe, calculate or estimate” the amount of GHGs that will result from a project.<sup>122,123</sup> The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.<sup>124</sup> A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the 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, local plan for the reduction or mitigation of GHG emissions.<sup>125</sup>

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local

<sup>120</sup> CEQA Guidelines Section 15064.7(c).

<sup>121</sup> CEQA Guidelines Section 15130 (f).

<sup>122</sup> CEQA Guidelines Section 15064.4(a).

<sup>123</sup> CEQA Guidelines Section 15064.4(a).

<sup>124</sup> CEQA Guidelines Section 15064.4(a)(1)-(2).

<sup>125</sup> CEQA Guidelines Section 15064.4(b).

plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, this analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal.

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's Green New Deal. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

### **CARB's Climate Change Scoping Plan**

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

#### **Mandatory Regulatory Compliance Measures**

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions.

- RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2019, LADWP indicated that 34 percent of its electricity came from renewable resources in Year 2016. Electricity GHG emissions provided above assume that LADWP will receive at least 33 percent of its electricity from renewable sources by the year 2020 and 50 percent by the year 2030 consistent with SB 350. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO<sub>2</sub>e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2022 renewables portfolio. It is noted that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements inasmuch as the Project is served by LADWP, which is committed to achieving the increase in renewable energy resources by the required dates. Given LADWP's progress towards

meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is assumed LADWP will comply.

- **SB 350:** 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 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting for the Project.
- **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year would indirectly be covered by the Cap-and-Trade Program.
- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025 and increasing the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by employees and deliveries to the Project. Mobile source GHG emissions conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation. The Project would further support this regulation by complying with the City's EV charging station requirements, which exceed Title 24 requirements.
- **Low Carbon Fuel Standard (LCFS):** The current LCFS requires a reduction of at least 7.5 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.
- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000. AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. The Project would comply with these percentage recycling

requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.<sup>126</sup> Project-related GHG emissions from solid waste generation includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CalGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.

### Applicable Scoping Plan Measures

Further evaluation of project design features and specific applicable policies and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

- **Energy Independence and Security Act of 2007 (EISA):** EISA requires phasing out of incandescent light bulbs sold in the United States resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting. The Project would not conflict with this requirement as the Project would incorporate energy-efficient light-emitting diode (LED) lighting throughout the Project. Electricity GHG emissions account for LED lighting electricity consumption.
- **CCR, Title 24, Building Standards Code:** The 2022 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2023 Los Angeles Green Code that in turn requires compliance with mandatory standards included in CalGreen. The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.
- **Assembly Bill 1109 (AB 1109):** The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.<sup>127</sup> The Project would not conflict with the requirements

<sup>126</sup> City of Los Angeles Zero Waste Progress Report, March 2013.

<sup>127</sup> AB 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534

under AB 1109 because it complies with local and state green building programs and incorporates energy-efficient LED lighting throughout the Project.

- **Senate Bill (SB) 375:** SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. As discussed under Checklist Section 17, Transportation and in the Transportation Assessment included as **Appendix K-1** of this SCEA, the Project's increased square footage would result in an increase in daily trips and VMT. As shown in **Appendix K-1**, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a 16.5-percent reduction in overall VMT and resultant GHG emissions compared to the unadjusted baseline ITE trip generation rates and LADOT VMT Calculator. The Project's reduction in VMT compared to a Project without reduction features would support the goals of the 2020–2045 RTP/SCS. Therefore, the Project would be consistent with SB 375, the reduction in passenger vehicle GHG emissions per capita goals provided in the 2020–2045 RTP/SCS, and with CARB's updated 2035 target.
- **Senate Bill (SB) X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code which requires a 20-percent reduction in water usage.
- **CARB In-Use On-Road Regulation:** CARB's in-use on-road heavy-duty vehicle regulation (Truck and Bus Regulation) applies to nearly all privately and federally owned diesel fueled trucks and buses with a gross vehicle weight rating greater than 14,000 pounds. Construction contractors working on the Project site would be required to comply with this regulation.

**Table 5.8-4** evaluates the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2022 Climate Change Scoping Plan Update*.<sup>128</sup> When compared to SB 32, the Proposed Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2022 Scoping Plan. **Table 5.8-4** confirms that the Proposed Project is consistent with the Scoping Plan's focus on increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been

<sup>128</sup> An evaluation of stationary sources is not necessary as the stationary sources emissions will be created by emergency generators that would only be used in an emergency.

formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the following analysis, the Project would be consistent with the State’s Climate Change Scoping Plan’s objective of achieving carbon neutrality statewide by 2045 and reducing 2030 GHG emissions in accord with SB 32.

Based on the analysis in **Table 5.8-4**, the Project would be consistent with the State’s 2022 Climate Change Scoping Plan and, thus, impacts related to consistency with the Scoping Plan would be less than significant impact.

**Table 5.8-4  
Consistency with the 2022 Scoping Plan Update**

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHG	<b>No Conflict.</b> The Project represents a mixed-use infill development within an urbanized area that would concentrate new residences and commercial uses within an HQTAs and reduce per capita VMT and GHG emissions. The Project would be consistent with SB 375 and its VMT reduction goals, as well as the GHG and transportation goals of the 2020-2045 RTP/SCS.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of Light Duty Vehicle sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality.  In November 2022, the Advanced Clean Cars II regulations took effect, setting ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly stringent emission standards (LEV program) to ensure automakers phase out sales of internal combustion engine vehicles.	<b>No Conflict.</b> Emissions from vehicle engines from the Project would be regulated by State regulations governing technology and cleaner emissions.

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report)	<p>EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality.</p> <p>CARB's Advanced Clean Truck Regulation accelerates the transition of zero-emission medium- and heavy-duty vehicles from 2024 to 2035.</p> <p>CARB also adopted the Innovative Clean Transit measure in 2018 that requires all public transit agencies to transition to zero emission fleets.</p>	<b>No Conflict.</b> While the Project would not generate substantial medium- and heavy-duty truck traffic, it would not impede the advancement of cleaner trucks over time.
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	<p>CARB focuses on reducing emissions from ground support equipment and airport transit vehicles. It is also working with national and international entities to tighten aircraft emission standards.</p> <p>AB 197: direct emissions reductions for sources covered by the AB 32 Inventory</p>	<b>No Conflict.</b> While the Project would not directly impact aviation industry, it would not impede the advancement of a cleaner aviation industry over time.
Ocean-going Vessels (OGVs)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	<p>AB 197: direct emissions reductions for sources covered by the AB 32 Inventory</p> <p>In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.</p>	<b>No Conflict.</b> While the Project would not directly impact trade or OGVs, it would not impede the advancement of a cleaner on- or off-shore sources over time.
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100%	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air	<b>No Conflict.</b> While the Project would not directly impact trade or port operations, it would not

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	of drayage trucks are zero emission by 2035.	<p>quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory.</p> <p>In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.</p>	impede the advancement of a cleaner on-shore sources over time.
Freight and Passenger rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	<p>AB 197: direct emissions reductions for sources covered by the AB 32 Inventory</p> <p>In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.</p>	<b>No Conflict.</b> While the Project would not directly impact freight or passenger rail, it would not impede the advancement of a cleaner locomotives over time. The Project's land uses would not include freight transportation or warehousing that would be subject to the California Sustainable Freight Action Plan. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> While the Project would not directly impact oil extraction, it would help reduce demand for petroleum products from energy, area, and mobile sources.
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> While the Project would not directly impact oil extraction, it would help reduce demand for petroleum products that require refining.
Electricity Generation	Sector GHG target of 38 MMTCO <sub>2</sub> e in 2030 and 30 MMTCO <sub>2</sub> e in 2035. Retail sales load coverage 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of electricity generation.

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	new fossil gas-fired resources.		
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would incorporate appliances that are consistent with Title 24 and Green Building requirements and consistent with the reduction of residential energy use. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would comply with Title 24 and Green Building requirements during construction and any future retrofit or appliance replacement requirements.
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not interfere with any future requirements to retrofit commercial appliances.
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of energy for food production.
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of energy for construction equipment.

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of energy for boilers.
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of energy for stone, clay, glass, and cement facilities.
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not directly impact the sources of energy for industrial facilities.
Combined Heat and Power	Facilities retire by 2040.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not affect facilities that produced heat and power.
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	<b>No Conflict.</b> The Project would not affect directly agricultural sources of energy.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory  In November 2022, the Advanced Clean Cars II regulations took effect, setting low emission standards for transportation.	<b>No Conflict.</b> This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions 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 the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS targets a 20% reduction in CI from a 2010 baseline by 2030.

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
			GHG emissions generated by Project-related vehicular travel would benefit from the Advanced Clean Cars Program.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	<p>SB 350: The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California 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. Required measures include increasing RPS to 50 percent of retail sales by 2030, establishing annual targets for statewide energy efficiency that achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.</p> <p>SB 100: The California Renewables Portfolio Standard Program (2018) requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It requires local publicly owned electric utilities to procure a minimum quantity of electricity from renewable energy resources of 44 percent of retail sales by December 31, 2024 and</p>	<p><b>No Conflict.</b> The Project would comply with this this action/strategy being located within the LADWP service area and would comply with CalGreen and Title 24 energy efficiency standards. LADWP must generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As LADWP would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. LADWP's 2021 LA100 Renewable Energy Study found that 45 percent of LADWP's electricity was from renewable sources in 2020 and that 100 percent of electricity could be achieved by 2045. In accordance with City Ordinance 187714, the Project would be all-electric with the exception of any cooking equipment associated with any restaurants or eating facilities and any gas-powered emergency backup systems.</p> <p>As required under SB 350, doubling of the energy efficiency savings from retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (consistency with this regulation is discussed</p>

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		60 percent by December 31, 2030.	below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	SB 1383 (2016) requires CARB to set 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels. The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.	<b>No Conflict.</b> This program applies to State regulators looking to reduce methane emissions from landfill and dairy facilities and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce such pollutants.
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 605 (2014) directed CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy.	<b>No Conflict.</b> This program applies to State regulators looking to reduce high GWP refrigerants and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce such pollutants.
Natural and Working Lands	Conserve 30% of the state's NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions.  SB 1386: NWL are an important strategy in meeting GHG reduction goals.	<b>No Conflict.</b> This program applies to State regulators governing Natural and Working Lands and is 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, EO N-82-20, SB 27, or SB 1386.
Forests and Shrublands	At least 2.3 million acres treated statewide annually	Restore health and resilience to overstocked	<b>No Conflict.</b> This program applies to State regulators

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization. EO B-52-18: CARB to increase the opportunity for using prescribed fire.  AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.	governing forest and shrubland management and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of EO B-52-18, AB 1504, or the Forest Carbon Plan.
Grasslands	At least 2.3 million acres treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.		<b>No Conflict.</b> This program applies to State regulators of grasslands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to reduce fuels in grasslands surrounding communities.
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands.	<b>No Conflict.</b> This program applies to State regulators overseeing croplands and is not directly related to development of the Project. However, the Project would not interfere or impede SB 859 and efforts to increase organic agriculture and conserve croplands.
Developed Lands	Increase urban forestry investment by 200% above current levels and	AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban	<b>No Conflict.</b> This program applies to State regulators addressing urban forestry

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	tree canopy 10% by 2035.	and is not directly related to development of the Project. However, the Project would not interfere or impede implementation of AB 2251 and efforts to increase the urban canopy.
Wetlands	Restore 60,000 acres of Delta wetlands		<b>No Conflict.</b> This program applies to State regulators restoring Delta wetlands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to restore wetland ecologies.
Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.		<b>No Conflict.</b> This program applies to State regulators slowing the conversion of sparsely vegetated lands and is not directly related to development of the Project. However, the Project would not interfere or impede efforts to slow urban conversion of such lands.
Cap-and-Trade Program	Implement the post-2020 Cap-and-Trade Program with declining annual caps.	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.	<b>Not Applicable.</b> This applies to the market-based program to reduce GHG emissions over time and is not applicable to a development project.

### SCAG 2020–2045 RTP/SCS

SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations

and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

The goals and policies of the 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service. Priority Growth Areas, which include HQTAs, Job Centers, Transit Priority Areas (TPAs), NMAs, Livable Corridors, and Spheres of Influence (SOIs), will account for less than 4 percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's PGAs, including HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.<sup>129</sup> Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS 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 the 2020–2045 RTP/SCS 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, the strategies and policies set forth in the 2020–2045 RTP/SCS 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. The Project's consistency with these general categories of strategies and policies are each discussed below.

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<sup>129</sup> SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.

**Table 5.8-5** provides a comparison of the Project against the GHG-related performance measures of the 2020-2045 RTP/SCS.

**Table 5.8-5  
Consistency with the 2020 RTP/SCS**

<b>Objectives</b>	<b>Consistency Analysis<sup>a</sup></b>
Increase percentage of region's total household growth occurring within HQTAs.	<b>No Conflict.</b> The Project would result in a net increase of 327 households in an HQTAs and would expand the diversity of housing choices, with 41 affordable units and additional live/work spaces that provide options for sustainable living.
Increase percent of the region's total employment growth occurring within HQTAs.	<b>No Conflict.</b> The mixed-use project would also include commercial spaces on the ground level that would increase service-related jobs on the Project Site and support the region's efforts to create jobs-housing balance in HQTAs.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	<b>Consistent.</b> The Project is an infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	<b>Consistent.</b> The Project is an infill development amid heavy transit infrastructure that includes access to Metro local bus services. The limited parking for 263 vehicles would reduce car ownership for residents that would further reduce daily VMT per capita.
Decrease average daily distance traveled for work and non-work trips (in miles)	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor with a heavy density of housing and jobs amid transit infrastructure that would reduce per capita travel distances.
Increase percentage of work and non-work trips which are less than 3 miles in length.	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor with a heavy density of housing and jobs amid transit infrastructure that would increase the rate of travel less than three miles in length.
Increase share of short trip lengths for commute purposes.	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor with a heavy density of housing and jobs amid transit infrastructure that would shorten commute trips.
Decrease average minutes of delay experienced per capita due to traffic congestion.	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit and active transportation mode share given its location.
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit and active transportation mode share given its location. As such, the Project would help reduce recurrent traffic congestion delay for general vehicles.
Decrease excess travel time for heavy-duty trucks result from the difference between reference speed and actual speed.	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit and active transportation mode share given its location. As such, the Project would help reduce recurrent traffic congestion delay for heavy-duty trucks.

Objectives	Consistency Analysis <sup>a</sup>
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	<b>Consistent.</b> The Project is an infill development that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility and lower car ownership rates due to the limited parking. Because the Project's location will attract travel to and from the Sunset Boulevard corridor and local community, the share of PM peak period trips that are less than 45 minutes would increase when compared to an urban sprawl location.
Increase percentage of trips that use transit (work and all trips)	<b>Consistent.</b> The Project is an infill development with convenient access to public transit options, include Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro's Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region.
Decrease average travel time to work (all modes)	<b>Consistent.</b> The Project is an infill development that will reduce the rate of growth in auto traffic and congestion by virtue of its transit and active transportation mode share given its location. Because the Project's location will attract travel to and from the Sunset Boulevard corridor and local community, average travel time to work should be reduced when compared to an urban sprawl location.
Increase percentage of trips using either walking or biking (by trip type)	<b>Consistent.</b> The Project is located on the Sunset Boulevard corridor, with density of residential and commercial uses that are walkable. The location of additional residents and jobs will continue the corridor's ability to promote active transportation.
Reduce per capita GHG emissions (from 2005 levels)	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility and lower car ownership levels. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	<b>Consistent.</b> The Project is an infill development in the dense Sunset Boulevard corridor that will reduce the rate of growth in SOV use and congestion by virtue of its transit accessibility. Residents, workers, and visitors can use public transit, including Metro Lines 4 and 60 on Sunset Boulevard, Lines 10/48 and 92 on Edgeware Road, Line 55 on Figueroa Street, as well as LADOT DASH (Lincoln Heights) circulator shuttle service on Cesar Chavez Avenue and LADOT DASH (Pico Union) on Edgeware Road. Metro's Grand Avenue Arts/Bunker Hill rail station is 4,500 feet south of the Project Site, where the A (Blue) and B (Red) Lines provide rail access to the region. On-site bicycle parking for residents and workers can support bicycle transport in lieu of driving and two Metro bikeshare stations provide other options for active

Objectives	Consistency Analysis <sup>a</sup>
	transportation. In addition, the live/work units will help reduce travel demand.

### Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.<sup>130</sup> By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. HQTAs will account for 3 percent of regional total land but are projected to accommodate 46 percent and 50 percent of future household and employment growth respectively between 2012 and 2040. The overall land use pattern in the 2020–2045 RTP/SCS reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

Consistent with the SCAG’s RTP/SCS alignment of transportation, land use, and housing strategies, the Project would provide residents and employees with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions.

The Project would concentrate new development within 0.5-mile (walking distance) of bus lines serviced by Metro and LADOT bus lines. Thus, residents and employees are provided with an alternative to single-occupant vehicle travel that would facilitate a reduction in VMT and corresponding vehicular GHG emissions. As such, the Project’s location provides some opportunities for the use of public transit to reduce vehicle trips. Moreover, the Project would represent a development within an existing semi-urbanized area that would include residential uses near other residential and commercial uses.

As discussed above, the Project would incorporate reduction measures to which will reduce VMT in comparison to a Project without reduction features. The Project’s estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2020–2045 RTP/SCS, which seeks improved “mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them. The Project represents a development within an existing urbanized area that would concentrate new residential uses within an HQTA, TPA, Job Center, and NMA and adjacent to a Livable Corridor. The convenient access to public transportation and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG’s 2020–2045 RTP/SCS.

### Consistency with VMT Reduction Strategies and Policies

As discussed under Checklist Section 11, Land Use and Planning, the Project includes GHG-reducing strategies from the 2020–2045 RTP/SCS that are applicable to the Project. Specifically, the Project includes characteristics that are consistent with strategies identified in the 2020–2045

<sup>130</sup> 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

RTP/SCS, and that would reduce Project trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. Such characteristics and VMT reducing measures include developing a mix of residential and commercial uses in close proximity to other residential and commercial uses, because in comparison, a similar project located further away from major residential centers or mass transit would not achieve a similar reduction in VMT. In addition, the Project would include EV parking at the Project Site reducing mobile source GHG emissions.

As discussed above, the Project represents an infill development within an existing urbanized area that would concentrate new residential uses within an HQT, TPA, and NMA and along a Livable Corridor. Furthermore, in accordance with Ordinance No. 185,480, the Project would provide bicycle parking spaces as required by the LAMC, in addition to bicycle-serving amenities that would further encourage biking. These project features would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

### **Increased Use of Alternative Fueled Vehicles Policy Initiative**

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. As discussed above, the Project Site would set aside parking spaces with EV charging equipment and spaces that support future EVSE. With the continued retention of these parking spaces under the Project, the Project would support the alternative fueled vehicle policy initiative.

### **Energy Efficiency Strategies and Policies**

The third goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would also use LID techniques to minimize the amount of stormwater that leaves the Project Site.

### **Land Use Assumptions**

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2020–2045 RTP/SCS, this SCEA also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and

regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project’s consistency with the applicable goals and principles set forth in the 2020–2045 RTP/SCS is discussed under Checklist Section 11, Land Use and Planning, of this SCEA. As shown under Checklist Section 11, the Project is consistent with the goals and principles set forth in the 2020–2045 RTP/SCS.

In sum, the Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long term climate policies.<sup>131</sup> By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS. Overall, the Project would not conflict with the 2020–2045 RTP/SCS, which is intended to reduce GHG emissions.

### **City of Los Angeles Sustainable City pLAN/City of LA Green New Deal**

The Sustainable City pLAN, a mayoral initiative, includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAN provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita and increasing trips made by walking, biking or transit. The Sustainable City pLAN was updated in April 2019 and renamed as L.A.’s Green New Deal. L.A.’s Green New Deal’s specific targets, include ensuring 57 percent of new housing units are built within 1,500 feet of transit by 2025 and 75 percent by 2035; reducing VMT per capita by at least 13 percent by 2025, 39 percent by 2035, and 45 percent by 2050; increasing the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025 and 50 percent by 2035 and has established targets such as 100 percent renewable energy by 2045, installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.<sup>132</sup>

Although the Sustainable City pLAN/L.A.’s Green New Deal is not directly applicable to private development projects, the Project would generally be consistent with these aspirations as the Project would concentrate a new residential development within 0.5-mile (walking distance) of the Metro and LADOT bus lines.

In accordance with Ordinance No. 185,480 and LAMC requirements, the Project would also provide bicycle parking spaces to further encourage biking. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance

<sup>131</sup> As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

<sup>132</sup> City of Los Angeles, L.A.’s Green New Deal, Sustainable City pLAN, 2019 Targets, [https://plan.lamayor.org/targets/targets\\_plan.html](https://plan.lamayor.org/targets/targets_plan.html), accessed February 21, 2023.

of the aspirations included in the Sustainable City pLAN with regard to energy-efficient buildings and waste and landfills. Moreover, the Project would include all electric appliances in the residential units. Therefore, the Project would be consistent with the Sustainable City pLAN.

In addition, the Project would use LED lighting to minimize use of electricity and would use native and drought-tolerant plant species in the landscaping to minimize water use. The Project Site will provide parking spaces which are electric vehicle (EV) ready and with EV-charging stations to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure. These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.<sup>133</sup> Therefore, the Project would be consistent with the Sustainable City pLAN and the L.A. Green New Deal.

## Conclusion

In conclusion, the Project would not conflict with the emission reduction measures discussed within CARB’s Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB’s Scoping Plan and updates, the Project would use “green building” features consistent with the CalGreen Building Code.<sup>134</sup> As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts, and would also not conflict with SCAG’s 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and include EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. Moreover, the Project would include all electric appliances in the residential units. As such, the Project would comply with the Sustainable City pLAN/L.A.’s Green New Deal.

Overall, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. In addition, in the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project would not generate GHG emissions that may have a significant impact on the environment. Thus, impacts relative to GHG Threshold (a) and GHG Threshold (b) would be less than significant.

## Cumulative Impacts

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

The analysis shows that the Project is consistent with CARB’s *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote

<sup>133</sup> However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

<sup>134</sup> The Project’s GHG emissions inventory does not take into account future regulations and legislation to reduce GHG emissions to achieve carbon neutrality by 2045. However, for all the reasons described above, the Project would support the State’s goals of Executive Order B-55-18 as well as AB 32 and SB 32 to achieve carbon neutrality by 2045.

economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The analysis also shows that the Project would be consistent with the 2020-2045 RTP/SCS, which would serve to reduce regional GHG emissions from the land use and transportation sectors by 2020 and 2035. In addition, the Project would comply with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence.

Furthermore, the Project would generally comply with the aspirations of the City's Air Quality Element and Green New Deal, which includes specific targets related to housing and development, and mobility and transit. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and their effects on climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change is less than significant.

## 1.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
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"/>

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

**H-1** Phase I Environmental Site Assessment, AEI, October 26, 2023

**H-2** Methane Investigation Report, Methane Specialists, May 11, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.
- b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.
- c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:
  - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. and ensure notification in the event the Coroner is not available.
  - The location of such hazardous materials.
  - An emergency response plan including employee training information.
  - A plan that describes the way these materials are handled, transported and disposed.
- d) Follow manufacturer’s recommendations on use, storage, and disposal of chemical products used in construction.
- e) Avoid overtopping construction equipment fuel gas tanks.
- f) Properly contain and remove grease and oils during routine maintenance of construction equipment.
- g) Properly dispose of discarded containers of fuels and other chemicals.

- h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.
- i) Identify and implement more stringent tank car safety standards.
- j) Improve rail transportation route analysis, and modification of routes based on that analysis.
- k) Use the best available inspection equipment and protocols and implement positive train control.
- l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.
- m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.
- n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.
- o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.
- p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.
- q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

### ***Applicability to the Project***

As analyzed below, no significant impacts are anticipated in relation to the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in connection with the Project. Regardless, consistent with **PMM HAZ-1**, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation, and the Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Existing regulations are equal to or more effective than **PMM HAZ-1**. Therefore, **PMM HAZ-1** is not incorporated into the Project.

**PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures

may include the following or other comparable measures identified by the Lead Agency:

Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:

- a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment;
- b) More stringent tank car safety standards;
- c) Improved rail transportation route analysis, and modification of routes based on that analysis;
- d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control;
- e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size;
- f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;
- g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident;
- 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.

### ***Applicability to the Project***

As analyzed below, no significant impacts are anticipated in relation to the reasonably foreseeable upsets and accidents involving the release of hazardous materials in connection with the Project. Regardless, consistent with **PMM HAZ-2**, appropriate hazardous materials management protocols would be implemented at the Project Site to the extent applicable during construction and operation, and the Project would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Existing regulations are equal to or more effective than **PMM HAZ-2**. Therefore, **PMM HAZ-2** is not incorporated into the Project.

**PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within 0.25

mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within 0.25 mile of schools, when school is in session, wherever feasible.
- b) Where it is not feasible to avoid transport of hazardous materials, within 0.25 mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.

### ***Applicability to the Project***

The Project would not emit or handle hazardous materials in proximity to a school. The Project Site is within 0.25 miles (1,320 feet) of the following schools:

- Little Friends Head Start Pre-School (707 Kensington Road), approximately 500 feet west
- Foundation for Early Childhood Education (1010 Douglas Street), approximately 1,150 feet northwest

However, neither school is located adjacent to the Project Site nor adjacent to the expected haul route using Sunset Boulevard, Figueroa Street, and Temple Street to the US-101 Freeway. Thus, no trucks are expected to pass nearby the schools.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, **PMM HAZ-3** is not applicable to the Project.

**PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase

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

- b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.
- c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action.
- d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans.
- e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building.
- f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.
- g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.
- h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate

measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.

- i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.
- j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.
- k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.
- l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.
- m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.
- n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other

building materials or stored materials classified as hazardous waste by state or federal law.

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

### ***Applicability to the Project***

Consistent with **PMM HAZ-4**, a Phase I ESA was prepared for the Project. Based on the findings of the Phase I ESA, and also consistent with **PMM HAZ-4**, the Project would implement **Mitigation Measure MM-HAZ-1**, pertaining to the development and implementation of a Soil Management Plan (SMP), which would ensure that potential impacts would be reduced to less than significant levels. Furthermore, the Project would implement all applicable hazardous materials management protocols and would comply with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials. Regulatory compliance and incorporation of Project-specific mitigation measure would be more effective than **PMM HAZ-4**, and as such, **PMM HAZ-4** would not be incorporated as part of the Project.

**PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions.
- b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks;
- c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation

### ***Applicability to the Project***

Consistent with this measure, the Project would implement **Project Design Feature PDF-TRAN-1**, which, consistent with current and standard City policy, would require the preparation and City approval of a Construction Traffic Management Plan to ensure that adequate emergency access is maintained during construction of the Project. **Project Design Feature PDF-TRAN-1** is equal to or more effective than the measures identified in **PMM HAZ-5**. As such, **PMM HAZ-5** would not be incorporated as part of the Project.

### **Impact Analysis**

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

#### **Less Than Significant Impact.**

##### **Construction**

The Project would not involve the routine (long-term) transport of hazardous materials to and from the Project Site during construction. During demolition, site preparation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project.

In addition, all potentially hazardous materials to be used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction.

Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

##### **Operation**

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in residential and commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. Due to the type of development proposed (e.g., residential and commercial uses), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of

hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

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

**Less Than Significant With Mitigation Incorporated.** As concluded in the Phase I ESA prepared for the Project, with adherence to regulatory requirements and implementation of **Mitigation Measure MM-HAZ-1**, construction and operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset or accidents conditions involving the release of hazardous materials into the environment.

The Phase I ESA included historical site utilization research and a site reconnaissance to identify potential on-site hazards. The current and past land uses within the Project Site were identified as part of the Phase I ESA to assess their potential to present concerns relative to the presence of hazards within the Project Site. These concerns are classified below:

- Recognized Environmental Condition (REC) is defined by the current ASTM Standard E1527 as the (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.
- Controlled Recognized Environmental Condition (CREC) is defined by the current ASTM Standard E1527 as a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).
- Historical Recognized Environmental Condition (HREC) is defined by the current ASTM Standard E1527 as a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).
- Other Environmental Considerations (OEC) warrant discussion, but do not qualify as RECs as defined by the current ASTM Standard E1527. These include, but are not limited to, de minimis conditions and/or environmental considerations such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property. A de minimis condition is defined by the ASTM Standard as a condition that generally does not present a threat to human health or the environment and that generally

would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

As discussed in the Phase I ESA, the Project Site was developed with a gas station (1925-1976), auto repair (1929-2013), chemical disinfected manufacturing (1950-1954), and other uses. In 2013, a Phase II investigation was conducted at the Project Site that included 17 borings for collection of soil and groundwater samples. No detectible levels of either volatile organic compounds (VOCs) or total petroleum hydrocarbons (TPH) were identified in any of the samples; however, five underground storage tanks (USTs) were identified at the location of the former gas station, as well as a sump and two clarifiers. In 2022, these five USTs, sump, one of the two clarifiers (no documentation of the removal of the second clarifier has been provided), and associated soils were removed from the Site under the supervision of the Los Angeles Fire Department (LAFD). Additional soil sampling was conducted at multiple locations following the removal of these subsurface features and associated soil, and while trace amounts of TPH were detected adjacent to two of the former UST locations, the detected levels were far below LAFD's regulatory minimum action level. Accordingly, LAFD issued a no further action (NFA) letter for the Site. By 2023, the entire Site is vacant.

## **Construction**

### **Hazardous Waste Generation, Handling, and Disposal**

As discussed above, during Project demolition, grading/excavation, and building, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site. However, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. As such, Project construction activities would not create or exacerbate a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of potentially hazardous materials.

### **Risk of Upset from Recognized Environmental Conditions and Other Site Conditions**

The Phase I ESA did not identify any RECs or CRECs, but did identify an HREC and OEC:

HREC:

- As noted above, the Project Site was previously developed with a gas station (1925-1976), auto repair (1929-2013), chemical disinfected manufacturing (1950-1954), and other uses. A Phase II investigation was conducted at the property in 2013 and borings were advanced throughout the subject property for the collection of 1-groundwater sample and soil samples. The borings were advanced at select locations of current and previously suspected industrial operations that could have impacted the subject property; However, VOCs and TPH were not detected in connection with this investigation. Due to the lack of a release detected, the historical on-site industrial operations represent a HREC.

OEC:

- As described above, the Project Site was previously occupied by various automobile and industrial uses. In addition, as described in the Phase I ESA, prior observations of the Project Site indicated the former presence of a hydraulic lift, which may have been installed in the mid-1960s, and could have potentially contained polychlorinated biphenyls. However, this lift was removed some time ago, and based on the lack of contamination found during prior soil and groundwater sampling, this is not considered a significant environmental concern. As also noted above, the Phase I ESA recommends that a Soil Management Plan (SMP) be implemented prior to and redevelopment of the subject property in order to address any unknown issues or unidentified subsurface features that may be discovered during future construction activities.
- According to ZIMAS, the subject property is located near significant oil production areas known as “Methane Zones”. Methane Zone sites include properties immediately surrounding gas sources and where testing and mitigation are required by the City of Los Angeles Department of Building and Safety. Due to the potential environmental risk associated with construction in Methane Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the subject property (Division 71 of the Los Angeles Building Code).

Based on the above, in addition to compliance with regulatory requirements, **Mitigation Measure MM-HAZ-1**, which addresses specific site conditions, would be implemented to further ensure that the Project would not exacerbate the risk of upset associated with site conditions.

### Oil Wells

The Project Site is located within the LA City Oil Field, which is one of 25 city designated major oil drilling areas. This designation is a broad swath of land generally from Vermont Avenue in the west to the I-110 Freeway to the east, and from Third Street and Dodger Stadium area in the north to Wilshire Boulevard in the south.<sup>135</sup>

According to California Department of Conservation maps, no oil wells exist on the Project Site.<sup>136</sup> The nearest wells (API 03725883, API 03725884, and API 03725886) are identified as Buried-Idle and were located two blocks south of the Site at the corner of Sunset Boulevard and Bellevue Avenue.

Much of the area identified has been developed with structures and is inaccessible for mining extraction. Furthermore, the Site is surrounded by dense urban uses, hilly roads, and sensitive

<sup>135</sup> Geotechnical, Oil/Gas Fields layer, <https://navigatela.lacity.org/navigatela/>, accessed October 5, 2023.

<sup>136</sup> California Department of Conservation Wellfinder map: <https://maps.conservation.ca.gov/doggr/wellfinder/>, accessed October 5, 2023.

residential receptors. Therefore, the Project would not exacerbate environmental hazards relative to oil wells.

## **Methane**

As noted above, the Project Site is located within a Methane Zone.<sup>137</sup>

Due to the potential environmental risk associated with construction in Methane Zones, the property owner is required to conduct a methane assessment prior to the redevelopment of the Site (Division 71 of the Los Angeles Building Code).

In March 2004, Ordinance Number 175,790 was adopted into the LAMC (Section 91.106.4.1 and Division 71, Chapter IX) to establish city-wide methane mitigation requirements, and included updated construction standards to control methane intrusion into buildings. This ordinance established defined geographic areas as Methane Zones and Methane Buffer Zones, which relate to specific assessment and mitigation requirements per area and set forth a standard of assessment and mitigation in the planning stages of all new construction in these areas.

The LADBS Methane Standard Plan provides a guide in the development of a site-specific plan. The Site will fall into one of five methane mitigation design levels identified as Levels I through V. As on-site methane concentrations increase, so do the requirements needed to reduce the dangers of methane intrusion to a less than significant level. There is a direct relationship between project zoning, test results, and the final design. Once the methane level is determined, the methane mitigation requirements can be implemented into the building design, under the permit and approval of LABDS and LAFD.<sup>138</sup>

A methane investigation was conducted in March 2013 and updated on May 11, 2023 to measure subsurface soil gas concentrations and pressures of methane at the Site and to determine site-specific methane mitigation requirements prescribed by the City's Department of Building and Safety. The methane was measured at greater than one percent of the Lower Explosive Limit (LEL) of methane at the Site. Therefore the Project falls under Design Level II, with less than 2 inches of water-column gas-pressure. Thus, per the Methane Code Table 1A, the Project does require a passive methane mitigation system. This is a regulatory process. As a result of compliance with the City's methane ordinance, impacts associated with causing upset conditions or exacerbation by the Project of existing methane in the environment would be less than significant.

## **Operation**

### **Hazardous Waste Generation, Handling, and Disposal**

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of residential and commercial uses, including cleaning products, paints, and those used for landscape maintenance. All hazardous materials present on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards

<sup>137</sup> <http://zimas.lacity.org>, accessed August 7, 2023

<sup>138</sup> <https://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigation-standards>

and all applicable federal, State, and local requirements, such as Federal Resource Conservation and Recovery Act and California Hazardous Waste Control Law and Federal Occupational Safety and Health Act and California Occupational Safety and Health Act. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during operation of the Project would be less than significant.

### **Risk of Upset from Recognized Environmental Conditions and Other Site Conditions**

The Project would adhere to applicable regulatory requirements pertaining to the use of hazardous materials, including the maintenance of required inspection logs, manifests, and records. Thus, operation of the Project would not exacerbate the risk of upset and accident conditions associated with RECs and other site conditions.

### **Underground and Aboveground Storage Tanks**

The Project does not propose the installation of USTs or ASTs. As such, operation of the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

### **Asbestos-Containing Materials**

Development of the Project would include the use of commercially-sold construction materials that would not include asbestos or ACMs. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to friable asbestos or ACMs at the Project Site.

### **Lead-Based Paint**

Development of the Project would include the use of commercially-sold construction materials that would not include LBP. Therefore, Project operation is not anticipated to increase the occurrence of or exposure to LBP at the Project Site.

### **Polychlorinated Biphenyls**

In accordance with existing regulations that ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems would not expose people to PCBs, and operation of the Project would not expose people to any risk resulting from the release of PCBs into the environment.

### **Oil Wells and Methane**

The Project does not include the installation of new oil wells. As such, operation of the Project would not exacerbate the risk of upset and accident conditions associated with operation or re-abandonment of oil wells. Thus, operation of the Project would not exacerbate environmental hazards relative to oil wells or methane.

## Mitigation Measure

### MM-HAZ-1: Soil Management Plan

A Soil Management Plan (SMP) will be developed and implemented to ensure any on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility, and that any previously unidentified subsurface features discovered during ground-disturbing activities be handled and disposed of in compliance with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.

Based on the above, with adherence to regulatory requirements and implementation of Project **Mitigation Measure MM-HAZ-1**, construction and operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with hazardous waste generation, handling, and disposal during construction and operation of the Project would be less than significant with mitigation.

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

**Less Than Significant Impact.** The Project Site is within 0.25 miles (1,320 feet) of the following schools:

- Little Friends Head Start Pre-School (707 Kensington Road), approximately 500 feet west
- Foundation for Early Childhood Education (1010 Douglas Street), approximately 1,150 feet northwest

However, neither school is located adjacent to the Project Site nor adjacent to the expected haul route using Sunset Boulevard, Figueroa Street, and Temple Street to the US-101 Freeway. Thus, no trucks are expected to pass nearby the schools.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential and commercial developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products.

Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials used during both the

construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

As such, the use of such materials would not create a significant hazard to nearby schools, and impacts would be less than significant.

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

**Less Than Significant Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of multiple agencies including the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA.

The Phase I ESA for the Project Site obtained a database search report from Environmental Data Resources, Inc. (EDR). The report documents findings of various federal, state, and local regulatory database searches regarding properties with known or suspected releases of hazardous materials or petroleum hydrocarbons. These findings are summarized below.

- 1185, 1187 Sunset Boulevard was identified on the standard environmental government sources, including RCRA NONGEN/NLR, HAZMAT, FINDS, ECHO, EDR HIST AUTO, HWTS, HAZNET, CERS HAZ WASTE. Aragon Properties Corp is listed on the RCRA NONGEN/NLR database as no longer generating hazardous waste as of May 3, 2022. The NAICS description was listed as "other building equipment contractors." There were no violations and the types of hazardous wastes generated were not reported. The HAZMAT listing was marked as inactive in 2022. According to EDR HIST AUTO, this site was occupied by a gas station from 1969 to 1979 and an auto shop from 1994 to 2014. A HWTS listing for O&J Auto was created in 2006 and marked as inactive in 2011. A HWTS listing for O&J Auto was created and marked as inactive in 2002. The NAICS description was listed as general automotive repair. One violation was listed on CalEPA, however the nature of the violation was not described. The HWTS listing for B&F Auto Repair was created in 2013 and marked as inactive in 2015.
- 1229 Sunset Boulevard was identified on FINDS, HAZMAT. The last "run date" was listed as November 1, 2022 and the facility status was listed as "inactive." The SIC code was listed as "lumber and other building materials dealers." No other significant information was provided. Based on the nature of occupation and lack of a documented release, this site is not expected to represent a significant environmental concern.
- 1211 Sunset Boulevard was identified on EDR HIST AUTO. According to EDR HIST AUTO, this site was occupied by an auto shop and gas station in 1929. No other significant information was provided.

- 1181 Sunset Boulevard was identified on EDR HIST AUTO. According to EDR HIST AUTO, this site was occupied by a gas station in 1942. No other significant information was provided.

None of the above database listings are associated with hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on the above analyses, while the Project is identified on standard government sources that monitor hazardous materials, conditions on the Project Site would not create a significant hazard to the public or the environment, and impacts would be less than significant.

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

**No Impact.** The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 11.5 miles west, Hollywood-Burbank Airport located 10.5 miles northwest. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels.

Therefore, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. No impact would occur.

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

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan, as outlined in **Project Design Feature PDF-TRAN-1** below.

The Construction Traffic Management Plan would ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access to and in the Project Site vicinity.

Therefore, the construction and operation of the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and impacts would be less than significant.

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

**No Impact.** The Project Site is located in an urbanized area without wildlands in its vicinity. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older “Mountain Fire District” and “Buffer Zone” of the Los Angeles General Plan Safety Element.

In addition, the Project Site is not located within a City-designated VHFHSZ.<sup>139</sup> Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires.

Therefore, Project construction and operation would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and no impacts would occur.

### **Cumulative Impacts**

**Less Than Significant Impact.** There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>140</sup>

Development of the Project in combination with the nine Related Projects has the potential to increase the risk of an accidental release of hazardous materials. However, each of the Related Projects would be required to comply with all applicable local, state, and federal laws, rules and regulations pertaining to the use, storage, and/or transport of hazardous materials, as discussed above for the Project. Furthermore, each Related Project would be required to be evaluated for project-specific hazardous risks. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties.

Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of site-specific recommendations for the Related Projects and the Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project’s contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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<sup>139</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

<sup>140</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

## 1.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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"/>

### SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste

discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

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

- k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.
- m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

### ***Applicability to the Project***

Consistent with **PMM HYD-1**, and as described below, the Project would comply with applicable state, regional, and City policies and regulations (e.g., General Construction Permit, MS4 permit, CWA, City stormwater ordinances) related to stormwater runoff and water quality. Conformance with applicable regulations would be ensured during the City's building permit plan review and approval process for the Project. Compliance with these regulatory requirements, which are equal to or more effective than **PMM HYD-1**, would ensure that the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, **PMM HYD-1** would not be incorporated as part of the Project.

**PMM HYD-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Avoid designs that require continual dewatering where feasible.

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

- a) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation.
- b) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.
- c) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

### ***Applicability to the Project***

Consistent with **PMM HYD-2**, should the Project require temporary or permanent dewatering, it would be conducted in compliance with all applicable regulatory requirements regarding water quality. These regulatory compliance measures would be equal to or more effective than Mitigation Measure **PMM HYD-2**. Thus, **PMM HYD-2** is not applicable to the Project.

**PMM HYD-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

### ***Applicability to the Project***

As discussed below, the Project Site is not located in a flood zone and would not impede or redirect flood flows. Therefore, **PMM HYD-3** is not applicable to the Project.

### **Impact Analysis**

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

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

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## Surface Water Quality

### Construction

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As Project construction would disturb more than one acre of soil, the Project would be required to retain coverage under the NPDES General Construction stormwater permit. In accordance with the requirements of this permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) with the State, which would specify BMPs and erosion control measures to be used during construction of the Project to manage runoff flows and prevent pollution.

The Project would be required by the City of Los Angeles to put in place an erosion control plan for the full duration of Project construction activities. The NPDES and SWPPP measures would be designed to contain and treat, as necessary, stormwater and construction watering for dust reduction on the Project Site to prevent runoff from impacting off-site drainage facilities or receiving waters. BMPs could include, but not be limited to, sandbag barriers, inlet protection, regular street sweeping, controlled entrance/exit with rumble plates, dust control, and designated staging areas for materials and equipment.

Site-specific BMPs, which will be implemented when construction commences, prior to site clearing and grubbing or demolition activities, would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Therefore, with compliance with NPDES requirements, including site-specific BMPs, and City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated. Thus, temporary construction-related impacts on surface water quality would be less than significant.

### Operation

Under the City's LID Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for at least the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of building roof drain downspouts, catch basins, and planter drains throughout the Project Site. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the "first flush" 85th percentile storm event, major storms are not anticipated to cause an exceedance of regulatory standards.

As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, trash, bacteria, nutrients, organics, pesticides, and metals.

The implementation of BMPs as required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Therefore, with the incorporation of LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Thus, impacts to surface water quality during operation of the Project would be less than significant.

## Groundwater Quality

### Construction

Construction activities for the Project would include grading and excavation to a depth of up to 62 feet for the subterranean level, foundation elements, and grading of soils for the worse-case under the descending slope in the northeast corner of the Site.<sup>141</sup> As provided in the Updated Geotechnical Engineering Investigation included as **Appendix F-1** of this SCEA, groundwater was encountered in all the borings drilled along Sunset Boulevard. Seepage occurred at depth of 9.3 feet to 24 feet.

Thus, Project construction activities could potentially encounter groundwater during excavation of the subterranean parking levels, which could require dewatering. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location and discharged into the storm drain system to proceed with construction. Discharges from dewatering operations can contain high levels of fine sediments, which, if not properly treated, could lead to exceedance of the NPDES requirements. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES requirements related to construction and discharges from dewatering operations. Furthermore, if dewatering is required, the treatment and disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Other potential effects to groundwater quality could result from removal of soil. Moreover, all proposed soil removal from the Project Site would be performed pursuant to a SMP required by **Mitigation Measure MM-HAZ-1**. Therefore, soils would not pose a significant hazard on groundwater quality.

There are also risks associated with contaminated soil impacting groundwater quality. In the event contaminated soils are encountered during construction, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166, as well as removal and handling protocols identified in the SMP required by **Mitigation**

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<sup>141</sup> Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

**Measure MM-HAZ-1.** Therefore, compliance with existing regulations and applicable mitigation measures would ensure the Project would not create a significant hazard to groundwater quality associated with potentially contaminated soil.

As previously discussed, during on-site grading and building construction, hazardous materials, such as fuels, oils, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as there are no existing groundwater production wells or public water supply wells nearby the Project Site, construction activities would not be anticipated to affect existing wells.

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

### **Operation**

Operational activities that could affect groundwater quality include spills of hazardous materials. Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater.

The Project would also comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Furthermore, as previously discussed, the Project would implement a SMP required by **Mitigation Measure MM-HAZ-1** to ensure all on-site contaminated soil is properly disposed of. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements.

As described above, the Project would include the installation of LID BMPs to treat and dispose of the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event prior to discharging the streets in the public right-of-way. The Project also does not include the installation or operation of water wells, or any extraction or recharge system. Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade ground water quality, and impacts will be less than significant.

Overall, as analyzed above, the construction or operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be less than significant.

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

**Less Than Significant Impact.** No water supply wells are located at the Project Site that could be impacted by construction, nor would the Project include the construction of water supply wells.

Construction activities for the Project would include grading and excavation to a depth of up to 62 feet for the subterranean level, foundation elements, and grading of soils for the worse-case under the descending slope in the northeast corner of the Site.<sup>142</sup> As provided in the Updated Geotechnical Engineering Investigation included as **Appendix F-1** of this SCEA, groundwater was encountered in all the borings drilled along Sunset Boulevard. Seepage occurred at depth of 9.3 feet to 24 feet.

Therefore, Project construction activities could encounter groundwater and temporary dewatering may be required. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements. 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.

Regarding groundwater recharge during operation, the Project would develop hardscape and structures that would cover the majority of the Project Site with impervious surfaces. The proposed lot coverage includes 53% building footprint, 12% paving/hardscape, and 35% landscaping.<sup>143</sup>

However, as previously discussed, the Project would include the installation of LID BMPs, which would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. The stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and would not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, the Project would not interfere substantially with groundwater recharge such that groundwater management would be impeded.

Overall, construction and operation of 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 and impacts during construction and operation of the Project would be less than significant.

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

<sup>142</sup> Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

<sup>143</sup> Project Environmental Assessment Form, filed August 2023.

**i. Result in substantial erosion or siltation on or off-site;**

**Less Than Significant Impact.** Construction activities for the Project would involve excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. Exposed and stockpiled soils could also be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

However, as discussed above in Response to Checklist Question 10.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters.

In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion or siltation on- or off-site. As such, construction-related impacts to hydrology would be less than significant.

No streams or rivers are located on or within the immediate vicinity of the Project Site. The closest water feature is Echo Park Lake, approximately 3,200 feet west of the Site.

At buildout of the Project, the Project Site would be comprised of approximately 65% impervious areas. The proposed lot coverage includes 53% building footprint, 12% paving/hardscape, and 35% landscaping.<sup>144</sup>

Accordingly, there would be a limited potential for erosion or siltation to occur from exposed soils. The Project would include BMPs that would address drainage flows and would ensure that substantial soil erosion or siltation does not occur. Therefore, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion or siltation on-site or off-site would occur.

Overall, the Project would comply with all applicable regulatory requirements, including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management. Through compliance with these regulatory requirements, the Project would not 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 result in substantial erosion or siltation on or off-site. Thus, impacts would be less than significant.

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<sup>144</sup> Project Environmental Assessment Form, filed August 2023.

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

**Less Than Significant Impact.** As indicated above, there are no streams or rivers within or immediately surrounding the Project Site. Construction activities for the Project would involve removal of the existing structures and associated hardscape as well as the excavation and removal of soil. These activities have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project site temporarily more permeable.

As discussed above in Response to Checklist Question 10.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. These BMPs are designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP and implementation of BMPs, as well as compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, construction-related impacts to hydrology would be less than significant.

At buildout of the Project, the Project Site would be comprised of approximately 65% impervious areas. The proposed lot coverage includes 53% building footprint, 12% paving/hardscape, and 35% landscaping.<sup>145</sup>

As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. As such, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-site or off-site. Thus, operational impacts to flooding would be less than significant.

Overall, with implementation of BMPs and compliance with applicable regulatory requirements including the LAMC's grading requirements regarding erosion control and state and local requirements regarding stormwater management, the Project would not increase the rate or amount of surface runoff in a manner that would result in flooding on or off-site. Thus, impacts would be less than significant.

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

**Less Than Significant Impact.** As discussed above, at buildout of the Project, the Project Site would be comprised of approximately 65-percent impervious areas. The Project Site currently does not have BMPs for the management of pollutants or runoff. Implementation of Project BMPs

<sup>145</sup> Project Environmental Assessment Form, filed August 2023.

would control stormwater runoff and could ultimately result in a minor decrease in runoff compared to existing conditions. In addition, the implementation of BMPs required by the City's LID Ordinance would target the pollutants that could potentially be carried in stormwater runoff.

Consequently, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and impacts would be less than significant.

#### iv. Impede or redirect flood flows?

**No Impact.** The Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA) or by the City.<sup>146,147</sup>

Thus, the Project would not impede or redirect flood flows, and no impact would occur.

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

**Less Than Significant Impact.** As discussed above, the Project Site is not located within a 100-year flood hazard area as mapped by FEMA or by the City.<sup>148,149</sup> In addition, the City does not map the Project Site as being located within a tsunami hazard area. Therefore, no tsunami or tsunami events would be expected to impact the Project Site. Additionally, there are no standing bodies of water near the Project Site that may experience a seiche.

Earthquake-induced flooding can result from the failure of dams or other water-retaining structures resulting from earthquakes. According to the City's Hazards Mitigation Plan, the Project Site is not located within a flood impact zone or located near a dam.<sup>150</sup>

Therefore, the risk of flooding from inundation by dam failure is considered low. Additionally, as discussed above, the Project would include new structural BMPs throughout the Project Site which would reduce the amount of pollutants entering the stormwater system and groundwater. Therefore, in the unlikely event of inundation of the Project Site, the Project would not result in a discharge of pollutants. Impacts would be less than significant.

146 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1628F and 06037C1610F, effective September 25, 2008. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed October 5, 2023.

147 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-2, Mapped Flood Hazards Areas in East Los Angeles APC, p. 10-9. [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed October 5, 2023.

148 Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1628F and 06037C1610F, effective September 25, 2008. <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed October 5, 2023.

149 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 10-2, Mapped Flood Hazards Areas in East Los Angeles APC, p. 10-9. [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed October 5, 2023.

150 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 12-1, Mapped Tsunami Inundation Area in West Los Angeles APC, p. 12-5. [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed October 5, 2023.

Overall, the Project would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone, and impacts would be less than significant.

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

**Less Than Significant Impact.** Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL).

The Project Site lies within the Los Angeles River Watershed and other urban watersheds.<sup>151</sup> Constituents of concern listed for urban watersheds under California’s Clean Water Act Section 303(d) List include PCBs, trash, mercury, arsenic, and dichlorodiphenyltrichloroethane. As discussed above, during construction, the Project would be required to implement a SWPPP that would set forth BMPs for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction.

In addition, the implementation of BMPs required by the City’s LID Ordinance during Project operation would target pollutants that could potentially be carried in stormwater runoff. As such, construction and operation of the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Los Angeles River Watershed and other urban watersheds.

With regard to potential impacts associated with groundwater management, as discussed above in Response to Checklist Question 10.a., of this SCEA, the Project would not expand any potential areas of contamination, increase the level of groundwater contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. In addition, the Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

Overall, based on the above, with compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Accordingly, impacts would be less than significant.

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<sup>151</sup> Los Angeles County Public Works, Watershed Management: <https://pw.lacounty.gov/wmd/siteIndex.cfm>, accessed October 5, 2023.

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## Cumulative Impacts

**Less Than Significant Impact.** There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>152</sup> The nine Related Projects comprise a variety of uses, including residential, commercial/retail, mixed-use, and institutional uses. The Project and these Related Projects, as well as other development projects in the area, would be required to comply with applicable regulatory requirements regarding drainage and water quality, including implementation of a SWPPP and BMPs, conformance with NPDES permit conditions, and a LID or Standard Urban Stormwater Mitigation Plan, which would reduce impacts to a less than significant level. Furthermore, the Project would not result in any water quality related impacts and would not increase peak stormwater flows from the Project Site. Therefore, the Project would not contribute to cumulative impacts regarding hydrology and water quality.

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<sup>152</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

## 1.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

### SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Facilitate good design for land use projects that build upon and improve existing circulation patterns
- b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:
  - Selecting alignments within or adjacent to existing public rights of way.
  - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project.
  - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
- c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:
  - Alignment shifts to minimize the area affected.

- Reduction of the proposed right-of-way take to minimize the overall area of impact.
- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.

### ***Applicability to the Project***

As described under Land Use and Planning Threshold (a) below, the Project would not physically divide an established community. Therefore, **PMM-LU-1** is not applicable to the Project.

**PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- 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.

### ***Applicability to the Project***

As outlined in the impact analysis under Land Use and Planning Threshold (b) below, the Project would not physically divide an established community or create a significant environmental impact due to a conflict with the 2020–2045 RTP/SCS, LAMC, Silver Lake-Echo Park-Elysian Valley Community Plan, or the City of Los Angeles General Plan. Therefore, **PMM LU-2** is not applicable to the Project.

### **Impact Analysis**

#### **a) Would the project physically divide an established community?**

**No Impact.** The Project Site is generally bounded by residential uses to the north and east, Sunset Boulevard to the west and Everett Street to the south. The Project Site is vacant.

The Project would be constructed within the boundaries of the Project Site and the proposed uses would be located within two 7-story buildings.

These uses would be consistent with other developments located adjacent to and in the general vicinity of the Project Site. All proposed development would also occur within the boundaries of

the Project Site. In addition, the Project does not propose a freeway or other large infrastructure that could divide the existing surrounding community.

Therefore, the Project would not physically divide an established community and no impact would occur.

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

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

A project is considered consistent with the provisions and general policies of applicable City or regional land use plan and regulation if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals.<sup>153</sup> More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan.

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

### **Southern California Association of Governments**

#### **Regional Transportation Plan/Sustainable Communities Strategy**

SCAG’s 2020–2045 RTP/SCS, also known as Connect SoCal, was adopted on September 3, 2020. The 2020–2045 RTP/SCS presents a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The core vision of the 2020–2045 RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020–2045 RTP/SCS builds upon this core vision with new initiatives at the intersection of land use, transportation, and technology to reach the region’s GHG reduction goals. These initiatives include policies, projects,

<sup>153</sup> *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th.704, 719.

and programs that strengthen and enhance each other beyond what each would accomplish in isolation. Strategies to advance the core vision address sustainable development, system preservation and resilience, demand and system management, transit backbone, complete streets, and goods movement. For each of these strategies, SoCal Connect provides information on progress made since the prior (2016–2040) RTP/SCS.

The Project’s consistency with the applicable goals and strategies of the 2020–2045 RTP/SCS, which largely reflect the goals that were established in the 2016–2040 RTP/SCS, is outlined in **Table 5.11-1**. As discussed therein, as an infill development located adjacent to a Job Center, within a TPA, an HQT, and a NMA, and along a Livable Corridor, the Project would be consistent with the applicable 2020–2045 RTP/SCS goals and strategies.

**Table 5.11-1**  
**Consistency with Applicable Goals and Strategies of the 2020–2045 RTP/SCS**

Goal/Strategy	Analysis of Project Consistency
<p><b>Goal 2:</b> Improve mobility, accessibility, reliability, and travel safety for people and goods.</p> <p><b>Goal 3:</b> Enhance the preservation, security, and resilience of 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>No Conflict.</b> The Project Site is located in an urbanized area within the City of Los Angeles that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site.</p> <p>In addition, the Project Site is served by several bus lines operated by the Metro and LADOT. The Project would replace the existing vacant Site with a new mixed-use development that would include residential and commercial uses.</p> <p>Locating the Project and the proposed uses within an urbanized area with an established network of streets and highways as well as various transit options would facilitate mobility and accessibility to and from the Project Site for residents of the Project.</p> <p>In addition, the Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities; accessible sidewalks and walkways that provide pedestrian access throughout the Project Site.</p> <p>All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.</p> <p>The Project would also provide 162 long-term and 21 short-term bicycle parking spaces in accordance with LAMC requirements.</p>

Goal/Strategy	Analysis of Project Consistency
	<p>Furthermore, the Project does not include any design features that could pose safety issues to travelers.</p> <p>Thus, the Project would maximize mobility and accessibility by providing opportunities for walking and biking and opportunities for the use of other alternative modes of travel, including convenient access to public transit. Thus, the Project would not conflict with these goals.</p>
<p><b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality.</p> <p><b>Goal 6:</b> Support healthy and equitable communities.</p> <p><b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.</p>	<p><b>No Conflict.</b> As discussed under Checklist Section 17, Transportation, the Project would improve bicycle and pedestrian infrastructure, which would be beneficial to traffic flow, transit service, pedestrian circulation, and overall mobility in the Project area, thereby facilitating a reduction in VMT and GHG emissions and improved air quality to contribute to the protection of the environment and support healthy and equitable communities, as well as support the goal of adapting to a changing climate and supporting an integrated regional development pattern and transportation network.</p> <p>As evaluated under Item 3, Air Quality, operation of the Project would result in less than significant impacts related to air quality, and short-term construction impacts related to regional construction emissions would be reduced to less than significant levels.</p> <p>As identified in Section 3, Project Description, and Checklist Section 8, Greenhouse Gas Emissions, the Project would include energy conservation, water conservation, and waste reduction features that would support and promote environmental sustainability.</p> <p>The Project would also comply with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. With implementation of regulatory requirements and sustainability features, impacts related to air emissions, which directly relate to the environment and the health of the City’s residents, would be less than significant.</p> <p>In addition, the Project Site’s location within an HQTAs, and thus, within close proximity to a variety of public transit options, would further support healthy and equitable communities. The Project’s mix of uses, pedestrian-friendly design, and provision of bicycle parking spaces would also promote a healthy</p>

Goal/Strategy	Analysis of Project Consistency
	community. Thus, the Project would not conflict with these goals.
<p><b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that results in more efficient travel.</p>	<p><b>No Conflict.</b> Although these goals apply at a regional level, as discussed above, the Project would incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen.</p> <p>The Project would promote non-auto travel and reduce the use of single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, and improving the pedestrian environment.</p> <p>The Project would also provide 27 parking spaces that are equipped with EV charging stations and 66 additional spaces capable of supporting future EVSE. Therefore, the Project would encourage and support more efficient travel. Thus, the Project would not conflict 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>No Conflict.</b> The Project would construct 327 residential units of various sizes and would set aside 41 units for Very Low-Income Households (i.e., 15 percent of the total project units). These units would consist of 13 studios, 230 one-bedroom, 79 two-bedroom units, and 5 3-bedroom in varying sizes and configurations, thereby providing a range of housing opportunities.</p> <p>Furthermore, the Project is within an HQTAs and is supported by multiple transportation options, as discussed above. Thus, the Project would not conflict with this goal.</p>
<p><b>Goal 10:</b> Promote conservation of natural and agricultural lands and restoration of habitats.</p>	<p><b>No Conflict.</b> As discussed under Checklist Section 4, Biological Resources, the Project Site is located in an urbanized area and contains limited to sparse landscaping in the form of nonnative/non protected trees, hedges, and shrubs.</p> <p>There are seven Mexican fan palms (<i>Washingtonia robusta</i>) street trees along Sunset Boulevard. The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (<i>Ailanthus altissima</i>) and various weeds.<sup>154</sup> The existing onsite trees will be removed and the Project would provide 84 new on-site trees.</p>

<sup>154</sup> Protected Tree Report, JTL Consultants, August 21, 2023.

Goal/Strategy	Analysis of Project Consistency
	<p>The seven Mexican fan palms on the Sunset Boulevard sidewalk will be protected during the development project by installing tree protection fencing around the trees. The Project arborist will be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures.<sup>155</sup></p> <p>None of the trees are considered to be protected by the City of Los Angeles Protected Tree and Shrub Ordinance.</p> <p>No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity.</p> <p>The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.</p>
<p><b>Focus Growth Near Destinations &amp; Mobility Options</b></p> <p>Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.</p> <p>Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.</p> <p>Plan for growth near transit investments and support implementation of first/last mile strategies.</p> <p>Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.</p> <p>Prioritize infill and redevelopment of underutilized land to accommodate new growth,</p>	<p><b>No Conflict.</b> The Project would construct 327 residential units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space.</p> <p>The proposed development would locate a mix of uses that, along with other development in the area, would serve as a shopping, dining, and gathering destination.</p> <p>The Project would also provide secure bicycle parking and easy bicycle accessibility to the Project Site to encourage alternative mobility for residents, employees, and visitors to the Project Site.</p> <p>Furthermore, the Project would provide housing and jobs near transit. The Project Site is also served by a variety of transit options provided by Metro and LADOT. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, and 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH (Pico Union) on Edgeware Road. Thus, the Project would not conflict with this land use strategy.</p>

<sup>155</sup> [Protected Tree Report](#), JTL Consultants, August 21, 2023.

<b>Goal/Strategy</b>	<b>Analysis of Project Consistency</b>
<p>increase amenities and connectivity in existing neighborhoods.</p> <p>Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).</p> <p>Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking).</p>	
<p><b>Strategy: Promote Diverse Housing Choices</b></p>	<p><b>No Conflict.</b> The Project would construct 327 residential units of various sizes and would set aside 41 units for Very Low-Income Households (i.e., 15 percent of the total project units). These units would consist of 13 studios, 230 one-bedroom, 79 two-bedroom units, and 5 3-bedroom in varying sizes and configurations, thereby providing a range of housing opportunities. Thus, the Project would not conflict with this land use strategy.</p>
<p><b>Leverage Technology Innovations</b></p> <p>Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.</p>	<p><b>No Conflict.</b> The Project would provide secure bicycle parking and bicycle accessibility mobility for employees and visitors to the Project Site. Specifically, the Project would provide 183 bicycle parking spaces (including 162 long-term spaces and 21 short-term spaces).</p> <p>Additionally, the Project would provide electric vehicle charging stations and electric vehicle supply wiring consistent with City requirements. Thus, the Project would not conflict with this land use strategy.</p>
<p><b>Support Implementation of Sustainability Policies</b></p> <p>Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.</p>	<p><b>No Conflict.</b> While this is a citywide strategy, the Project would support it. The Project’s design is based on smart growth principles and environmental sustainability, as demonstrated by its mixed-use configuration, emphasis on walkability, bike-friendly environment, and proximity to public transit.</p> <p>Additionally, the Project would incorporate environmentally sustainable design features required by the Los Angeles Green Building Code. The Project would also utilize sustainable planning and building strategies and would incorporate the use of environmentally friendly materials wherever applicable.</p> <p>Furthermore, the Project would incorporate additional sustainable features including high efficiency plumbing fixtures and weather-based controller and drip irrigation</p>

Goal/Strategy	Analysis of Project Consistency
	<p>systems, Energy Star-labeled appliances, and water-efficient landscape design.</p> <p>The Project would also comply with the City's EV charging requirements. In addition, the new residential units would be equipped with high efficiency toilets and low-flow showerheads. Thus, the Project would not conflict with this land use strategy.</p>
<p><b>Promote a Green Region</b></p> <p>Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.</p> <p>Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.</p> <p>Promote more resource efficient development focused on conservation, recycling and reclamation.</p>	<p><b>No Conflict.</b> The Project's location, land use characteristics, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations.</p> <p>The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and the CALGreen Code. These standards would reduce energy and water usage and waste and, thereby, improve climate resiliency and reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure.</p> <p>Sustainability features include, but would not be limited to: use of environmentally-friendly building materials such as non-toxic paints; high efficiency plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and drought tolerant planting. Some of these measures are consistent with the requirements of the Los Angeles Green Building Code, while some exceed code requirements. These measures would also support resource efficiency by conserving water and energy. Thus, the Project would not conflict with these land use strategies.</p>
<p>SCAG, 2020-2045 RTP/SCS: <a href="https://scag.ca.gov/read-plan-adopted-final-connect-social-2020">https://scag.ca.gov/read-plan-adopted-final-connect-social-2020</a></p>	

## City of Los Angeles General Plan

### Framework Element

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

objectives and policies of the General Plan Framework Element is provided in **Table 5.11-2** and summarized below.

**Table 5.11-2  
Consistency with Applicable Goals, Objectives, and Policies of the General Plan Framework**

Goal, Objectives, Policies	Analysis of Project Consistency
<b>Framework Element Land Use Chapter</b>	
<p><b>Goal 3A:</b> Physically balanced distribution of land uses.</p>	<p><b>Consistent.</b> The City of Los Angeles is experiencing a severe housing shortage and this Project would provide an additional supply of 327 dwelling units to help meet the demand for new residential units.</p> <p>The residential use would be compatible with and complement the other multifamily residential uses on the block, and the additional residential population would further activate the surrounding area and provide an additional customer base for businesses in the community. This project would also help to make more viable the long-term physical maintenance of the property, resulting in improved community aesthetics and safety.</p> <p>The Framework Element of the General Plan establishes general policies for the City based on projected population growth. Land use, housing, urban form and neighborhood design, open space, economic development, transportation, infrastructure and public services are all addressed in the context of accommodating future City-wide population growth. The City’s various land use “categories” are defined based on appropriate corresponding development standards including density, height and use. The Project furthers the goals, objectives and policies of the General Plan Framework Element.</p> <p>Chapter 4 of the General Plan Framework outlines that the City has “insufficient vacant properties to accommodate forecasted population increases. Consequently, the City’s growth would require the reuse and intensification of existing developed properties.” The Project would develop new buildings on commercially zoned land near transit in order to develop a residential Project with 327 dwelling units.</p> <p>Therefore, the Project is in substantial conformance with the purposes, intent, and provisions of the Framework Element of the General Plan.</p>

<p><b>Objective 3.1:</b> Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses and visitors.</p>	<p><b>Consistent.</b> The proposed residential project would develop a vacant site. The Project adds to the City’s existing housing stock by adding new housing including 327 dwelling units designed in a variety of configurations and sizes to serve various housing needs within the City.</p> <p>The new residents would be within walking distance of the some of the region’s most popular retail, dining, and entertainment destinations while, at the same time, reinforcing the economic viability of commercial establishments along Sunset Boulevard with future patrons.</p>
<p><b>Objective 3.2:</b> 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.</p>	<p><b>Consistent.</b> The Project’s height and density is appropriately placed in a General Commercial designation and is in close proximity to a Major Transportation Stop. The Project Site is near many other transit stops.</p> <p>Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.</p> <p>The Project would further enhance the pedestrian realm, which would conserve the existing neighborhood pedestrian patterns and promote the use of multi-modal transportation options. Furthermore, the Project Site is on a major commercial corridor and would not remove any existing residential buildings or open space, therefore conserving the character of nearby residential neighborhoods.</p>
<p><b>Objective 3.4</b> 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.</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 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</p>	<p><b>Consistent.</b> The Project Site has a General Commercial Land Use Designation and is located along Sunset Boulevard, both a primary transit corridor and one of the City’s major boulevards. The surrounding uses along the arterial streets are improved with institutional, retail, commercial and residential uses.</p> <p>The proposed residential project would develop a vacant site and creates new residential units near transit while at the same time conserving existing residential neighborhoods.</p>

<p>boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.</p>	
<p><b>Objective 4.2:</b> Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</p> <p><b>Policy 3.13.4:</b> Provide adequate transitions where commercial and residential uses are located adjacent to one another.</p>	<p><b>Consistent.</b> The entire Site is designated as General Commercial by the Community Plan and is located along Sunset Boulevard that is designated as a Mixed Use Boulevard on the General Plan Framework Long-Range Land Use Diagram. According to the diagram, a Mixed Use Boulevard “will fall within a range of floor area ratios from 1.5:1 up to 4.0:1 and be generally characterized by 1- to 2-story commercial structures, up to 3- to 6-story mixed use buildings between centers and higher buildings within centers. Mixed Use Boulevards are served by a variety of transportation facilities.” The Project is well within both the FAR and height ranges that the General Plan Framework Element prescribes for developments along Mixed Use Boulevards, as it proposes a 7-story building with a 3.0:1 FAR. Further, Sunset Boulevard is a designated Major Highway and is a considered important transit corridor for the area.</p> <p>Therefore, the Project is consistent with the Framework Element’s Long Range Land Use Diagram for Mixed Use Boulevard developments.</p> <p>Currently, the Site is vacant and not providing any development with a benefit to the community. Thus, the Site provides an opportunity to develop a mixed-use project where planned major transit facilities will be located, consistent with the General Plan Framework. The Project will add 327 residential units (including 41 Very Low Income affordable units) and approximately 9,624 square feet of commercial space to this underutilized Site, all of which will be consistent with the Site’s land use designation and zoning.</p> <p>The Project will provide adequate transitions and buffers between the mixed-use development and the surrounding neighborhood. As noted, the Project has been designed with the site topography which slopes from the high elevation at the northwest west</p>

	<p>corner on Sunset Boulevard to the low elevation at the northeast corner on Everett Street by approximately 100 feet in elevation. As a result, the height of the Project mimics the topography and steps down in elevation. Trash receptacles and loading areas will be strategically located on the site and screened from public view to the extent possible to minimize any potential impacts to adjacent properties. Parking will be provided in full conformance with Code requirements for all Project uses, and the residential component will satisfy Code requirements for an affordable housing density project. The parking will be located in an on-site subterranean garage or buffered at the street level by habitable uses. Thus, the Project will provide adequate transitions where commercial and residential uses are located adjacent to one another, consistent with the General Plan.</p>
<p><b>Policy 4.2.1:</b> Offer incentives to include housing for very low- and low-income households in mixed-use developments.</p>	<p><b>Consistent.</b> The Project requests a 22 percent density bonus and includes 41 Very Low Income affordable housing units or 15% of by-right units.</p>
<p><b>Mobility Element</b></p>	
<p><b>Policy 2.3:</b> Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.</p>	<p><b>Consistent.</b> The Project would be located within a commercial corridor in a highly walkable location.</p> <p>The Project would further promote pedestrian activity by developing a residential use in proximity to public transit options. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.</p>
<p><b>Policy 3.1:</b> Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City’s transportation system.</p>	<p><b>Consistent.</b> The Project would promote this policy by providing adequate vehicular access.</p> <p>The Project would further promote pedestrian activity by developing a residential use in proximity to public transit options. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.</p>
<p><b>Policy 3.2:</b> Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.</p>	<p><b>Consistent.</b> The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) and the City’s applicable related building code regulations.</p>
<p><b>Policy 3.3:</b> Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.</p>	<p><b>Consistent.</b> The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new residential development in close proximity to in a highly walkable location.</p>

	The Project is located in an area with ample transit within walking distance.
<b>Policy 3.4:</b> Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	<b>Consistent.</b> The Project would further promote pedestrian activity by developing a residential use in proximity to public transit options. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.
<b>Policy 3.5:</b> Support “first-mile, last-mile solutions” such as multi-modal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multi-modal connectivity and access for transit riders.	<b>Consistent.</b> The Project would activate the area around various high usage transit stops along a designated transit corridor with a housing use. This would allow connections to nearby transit stops and support “first-mile, last-mile solutions”.
<b>Policy 3.7:</b> Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	<b>Consistent.</b> The Project is in proximity to public transit options. Specifically, transit options in the vicinity of the Project Site include the Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.
<b>Policy 3.8:</b> Provide bicyclists with convenient, secure and well maintained bicycle parking facilities.	<b>Consistent.</b> The Project would provide secure bicycle parking and bicycle accessibility mobility for employees and visitors to the Project Site. Specifically, the Project would provide 183 bicycle parking spaces (including 162 long-term spaces and 21 short-term spaces).
<b>Policy 3.9:</b> Discourage the vacation of public rights-of-way	<b>Consistent.</b> The Project would not vacate any public rights-of-way, all associated public rights-of-way would be maintained as part of the Project.
<b>Policy 3.10:</b> Discourage the use of cul-de-sacs that do not provide access for active transportation options.	<b>Consistent.</b> The Project would not include the development of a cul-de-sac.
<b>Policy 4.8</b> Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	<p><b>Consistent.</b> The LADOT’s requirement for a transportation assessment is if a development is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action.<sup>156</sup></p> <p>LADOT’s VMT calculator, Version 1.3, was used to determine if a development would exceed any of the Transportation Impact Assessment criteria that would require further transportation impact analysis.</p> <p>Based on the land use and size of the existing and proposed uses, the VMT calculator determined that the Project would generate a net increase of 2,217 Daily Vehicle Trips). Therefore, based on the City threshold to trigger further traffic analysis of 250 new daily vehicle trips, a transportation assessment is</p>

<sup>156</sup> [Transportation Assessment Guidelines](#), LADOT, August 2022.

	required for the Project. The proposed daily household VMT is 5.3, which is below the threshold of significance of 7.2. Therefore, the Project would result in less than significant impacts on VMT and no mitigation is required. <sup>157</sup>
<b>Policy 5.2</b> Support ways to reduce vehicle miles traveled (VMT) per capita.	<b>Consistent.</b> The Project would include residential uses located in a commercial corridor characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well-served by existing public transportation. Therefore, the Project would support VMT reductions.
<b>Policy 5.4</b> Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	<b>Consistent.</b> This policy applies to large-scale goals relative to fuel sources, technologies and infrastructure.  In general, existing residential buildings or existing buildings converted to residential uses do not need to provide EV parking spaces. EV and EV ready spaces are not planned to be provided.
<b>Policy 5.5</b> Maximize opportunities to capture and infiltrate stormwater within the City’s public right-of-ways.	<b>Consistent.</b> The Project would comply with the City’s Low Impact Development (LID) ordinance.
<b>Housing Element (2021-2029)</b>	
<b>Objective 1.1</b> Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.	<b>Consistent.</b> The Project would create housing on a site where none previously existed and would therefore result in no loss of housing.  The proposed residential project would develop a vacant site. The Project adds to the City’s existing housing stock by adding new housing including 327 dwelling units designed in a variety of configurations and sizes to serve various housing needs within the City.  The Project would contribute to the total number of units as deemed necessary in the Regional Housing Needs Assessment.  The Department of Housing and Community Development (HCD) Regional Housing Needs Determination for Southern California, in accordance with Government (“Gov”) Code Section 65584.01, has determined the minimum regional housing need as for the Southern California region is 1,344,740 total units. The Southern California Association of Governments (SCAG) distributes the housing among its local governments. Based SCAG’s RHNA allocation, the City of Los Angeles is required to provide 455,577

<sup>157</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

	<p>units including 196,368 market rate units and 115,680 Very Low Income units. It is likely the City would need to quadruple its housing production from the current cycle in order to meet the proposed RHNA allocation for the next cycle.</p> <p>The Project is located in an area of the City identified by the Housing Element and RTP/SCS as suitable for high density housing development on a scale that is realistically likely to meet the City’s RHNA obligations. The Project would provide 327 units, which would advance the City’s housing supply toward the goals outlined by HCD and SCAG.</p>
<p><b>Objective 1.2</b> Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.</p>	<p><b>Consistent.</b> The Project would not involve the removal of any existing housing and would add 327 new dwelling units where housing did not previously exist.</p> <p>The Project has been developed to provide an appropriate design that is compatible with existing development in the community. As such, the Project would promote a livable neighborhood with a new housing type in a building designed to be appropriate in scale and character to the surrounding area.</p>
<p><b>Objective 3.1</b> Use design to create a sense of place, promote health, foster community belonging, and promote racially and socially inclusive neighborhoods.</p>	<p><b>Consistent.</b> The Project promotes walkable communities by locating higher density new housing near public transit. Project amenities include residential spaces and recreational uses that would promote healthy activities for future residents. The Project would also activate the Project Site with a mix of uses that would provide a secure building, lighting, and provide “eyes on the street” with a security plan, thus promoting public safety.</p> <p>The Project Site is an infill site located within walking distance to transit options. As such, the Project would contribute to the promotion of a sustainable community.</p>
<p><b>Objective 3.2</b> Promote environmentally sustainable buildings and land use patterns that support a mix of uses, housing for various income levels and provide access to jobs, amenities, services and transportation options.</p>	<p><b>Consistent.</b> The Project would comply with the Los Angeles Green Building Code (LAGBC), as applicable. Further, pursuant to the California’s CALGreen Building Standards, the Project Applicant would be required to recycle/divert construction waste generated on the Project Site in accordance with the LAMC.</p> <p>The public transit access and walkability to services in the area, reduces dependency on fossil fuels.</p> <p>As such, the Project would contribute to the promotion of sustainability by maintaining an existing building.</p>

<p><b>Objective 4.1</b> Ensure that housing opportunities are accessible to all residents without discrimination on the basis of race, color, ancestry, sex, national origin, color, religion, sexual orientation, gender identity, marital status, immigration status, family status, age, intellectual, developmental, and physical disability, source of income and student status or other arbitrary reason.</p>	<p><b>Consistent.</b> The Project would comply with all federal, state, and local laws regarding fair housing practices, accessibility, and the production, preservation, and operation of housing.</p>
<p><b>Objective 4.2</b> Promote outreach and education on fair housing practices and accessibility among residents, community stakeholders and those involved in the production, preservation and operation of housing.</p>	<p><b>Consistent.</b> The Project would comply with all federal, state, and local laws regarding equal housing without discrimination on the basis of race, ancestry, sex, national origin, color, religion, sexual orientation, marital status, familial status, age, disability (including HIV/AIDS), and student status.</p>
<p><b>Conservation Element</b></p>	
<p><b>15.1 Objective:</b> Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>	<p><b>Consistent.</b> The Project Site and surrounding area are characterized by dense urban development.</p> <p>Due to existing buildings in the area, views are generally obstructed, and no scenic vistas exist.</p> <p>Therefore, the Project would not have any adverse effect on a scenic vista for the enjoyment of present and future generations.</p>
<p><b>15.1 Policy:</b> Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.</p>	<p><b>Consistent.</b> The Project Site does not contain any significant existing landforms (e.g., ridge lines, bluffs, unique geologic features) or unique scenic features (historic, ocean, mountains, unique natural features).</p> <p>The Project Site is located in an urbanized portion of the City and topographically relatively flat. The Project Site is not a part of a scenic resource and would not obstruct any scenic views.</p>
<p><b>Health and Wellness Element</b></p>	
<p><b>1.5</b> Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p><b>Consistent.</b> The Project would provide housing opportunities to the community within walking distance to existing public transit, helping to reduce dependence on vehicles and the air pollutants generated by vehicular traffic. In addition, the Project would be located within and near the job centers of Downtown Los Angeles.</p>
<p><b>2.2</b> Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.</p>	<p><b>Consistent.</b> The Project would promote pedestrian activity, with a residential development.</p> <p>The Project proposes to provide 327 dwelling units that would offer healthy design features such as natural light and ventilation, as well as open space areas that are both outdoors and within indoor spaces that promote physical activity and positive social experiences. The Project's location and orientation to</p>

	<p>the street would enhance pedestrian-oriented circulation for both residents and visitors.</p> <p>The Project would be designed to encourage pedestrian activity.</p> <p>The Project would provide secure bicycle parking and bicycle accessibility mobility for employees and visitors to the Project Site. Specifically, the Project would provide 183 bicycle parking spaces (including 162 long-term spaces and 21 short-term spaces).</p> <p>Appropriate lighting would be provided to increase safety and provide theft protection during nighttime parking.</p>
<p><b>2.3</b> Strive to eliminate barriers for individuals with permanent and temporary disabilities to access health care and health resources.</p>	<p><b>Consistent.</b> Design of the Project would comply with all existing federal, state, and local regulations, including the Americans with Disabilities Act (ADA) and the state and City building codes to eliminate barriers for individuals with permanent and temporary disabilities.</p>
<p><b>2.11</b> Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure deficiencies that threaten the health, safety, and well-being of the most vulnerable users.</p>	<p><b>Consistent.</b> See Policy 1.5 above regarding how the Project’s mix of uses and location near transit would support healthy communities and healthy living.</p>
<p><b>5.1</b> Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.</p>	<p><b>Consistent.</b> See Policy 1.5 above regarding how the Project’s uses and location near transit would support healthy communities and healthy living.</p>
<p><b>5.3</b> Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.</p>	<p><b>Consistent.</b> The Project would reduce exposure to second-hand smoke in accordance with applicable law, such as prohibition on smoking in rental residential units (California Civil Code Section 1947.5).</p>
<p><b>5.4</b> Protect communities’ health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.</p>	<p><b>Consistent.</b> The Project’s regional and local, construction emissions and operational emissions would be less than significant.</p> <p>The Project would comply with existing regulations pertaining to hazardous materials to ensure that no significant impacts related to upset and accident conditions related to hazardous materials would occur as a result of the Project.</p> <p>Finally, the Project does not include facilities that would use hazardous materials, such as a dry cleaner, industrial manufacturing processes, or automotive</p>

	repair facilities. The Project would not result in any impacts related to odors.
<b>5.7</b> Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.	<p><b>Consistent.</b> The Project would comply with Section 2485 in CCR Title 13, which requires trucks and vehicles in loading and unloading queues to have their engines turned off after five minutes when not in use, in order to reduce vehicle emissions.</p> <p>The public transit access and walkability to services, reduces dependency on fossil fuels. This reduces GHG and mobile source pollution.</p>
<b>Infrastructure and Public Services Chapter</b>	
<b>Objective 9.10:</b> Ensure that water supply, storage, and delivery systems are adequate to support planned development.	<p><b>Consistent.</b> Based on the Los Angeles Department of Water and Power's (LADWP) demand projections provided in its 2020 Urban Water Management Plan<sup>158</sup>, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area for development that is consistent with the General Plan and other growth plans.</p> <p>As the Project's water demand is accounted for in the City's future projected demands (the 2020-2045 RTP/SCS includes growth throughout the Los Angeles subregion and informs the LADWP 2020 UWMP), the Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect.</p> <p>In general, projects that conform to SCAG's 2020-2045 RTP/SCS demographic projections and are in the City's service area are considered to have been included in LADWP's water supply planning efforts in the UWMP. The Project is consistent with the General Plan designation and Community Plan and zoning. In terms of the City's overall water supply condition, the water requirement for any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.</p>
<b>Goal 9P:</b> Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental,	<b>Consistent.</b> The Project would introduce new sources of artificial light to the Project Site, including low-level exterior lights for security and way-finding purposes, as well as general accent lighting.

<sup>158</sup> LADWP 2020 Urban Water Management Plan, page ES-6: <https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpLn;jsessionid=0LnWhxdVj2Jg2Vm6Xrr4rmqyLL9GtlpLdJBQxVQgdb53TnwhJRB!-1106340359?afLoop=151440072116797&afWindowMode=0&afWindowId=null#%40%3FafWindowId%3Dnull%26afLoop%3D151440072116797%26afWindowMode%3D0%26adf.ctrl-state%3Dw319yjmek4>

<p>and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and information lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.</p>	<p>The Project would not include electronic lighting or signs with flashing or strobe lights. All exterior lighting would be shielded or directed toward the areas to be lit to limit spill-over onto off-site uses. The Project would comply with the City's lighting and signage ordinances and would have signage approved by LADBS.</p>
<p>General Plan, Chapter 3-Land Use: <a href="https://planning.lacity.org/cwd/framwk/chapters/03/03205.htm">https://planning.lacity.org/cwd/framwk/chapters/03/03205.htm</a>  City of Los Angeles, Conservation Element of the General Plan, March 2001.  Housing Element: <a href="http://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch6.pdf">http://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch6.pdf</a>  City of Los Angeles, Health and Wellness Element of the General Plan, March 2015.  General Plan, <a href="http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm">http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm</a>  Note: This table includes only the policies that are applicable to the Project.</p>	

### Land Use Chapter

The Framework Element Land Use Chapter identifies districts, centers, and mixed-use boulevards, which are described in terms of ranges of intensity/density, heights, and lists of typical uses. Additionally, the Project would support and would be consistent with the Land Use Chapter as it would contribute to the City's goal for a physically balanced distribution of land uses that facilitates 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, and assurance of environmental justice and a healthful living environment.

In particular, the Project would promote a more balanced distribution of land uses with the replacement of a vacant site with a new mixed-use building that would include residential uses and ground-floor retail and restaurant space that could be filled by a variety of tenants. These proposed uses would be developed in an area well served by public transit provided by Metro and LADOT. Specifically, transit options in the vicinity of the Project Site include Metro Bus Lines 4, 10/48, 55, 60, 92, Metro A and E Lines, and LADOT DASH Lincoln Heights and LADOT DASH Pico Union.

Furthermore, the Project would provide secure bicycle parking and EV charging infrastructure on-site. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution, while supporting the City's objective to encourage multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter adopted for the purpose of avoiding or mitigating an environmental effect.

### Urban Form and Neighborhood Design Chapter

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

and public facilities. “Neighborhood design” is defined as the physical character of neighborhoods and communities.

The Framework Element does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the community plans. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

The Project’s consistency with the relevant objectives and policies that support the goals of the Urban Form and Neighborhood Design Chapter of the Framework Element is discussed under Checklist Section 1, Aesthetics, of this SCEA (**Table 5.1-1**). As concluded therein, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element’s Urban Form and Neighborhood Design Chapter.

### **Open Space and Conservation Chapter**

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources, address the outdoor recreational needs of the City’s residents, and guide amendments to the General Plan Open Space Element and Conservation Element. This chapter also includes policies to resolve the City’s open space issues. Specifically, this chapter contains open spaces goals, objectives, and policies regarding resource conservation and management, outdoor recreation, public safety, community stability, and resources development.

The Project’s consistency with the Framework Element’s Open Space and Conservation Chapter is discussed in **Table 5.11-2**. As described therein, the Project would be consistent with the relevant objectives and policies that support the goals of the Open Space and Conservation Chapter of the Framework Element.

The Project would request an off-menu density bonus incentive, for a 30% reduction in open space to require 24,535 square feet in lieu of the otherwise required 35,050 square feet. The Project would incorporate a variety of open space and recreational amenities throughout the Project Site totaling approximately 24,540 square feet, which would exceed the requirements of the LAMC to provide a minimum of 24,535 square feet of open space.

Furthermore, the Project would not conflict with or encroach upon the public and private open space system. Therefore, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element’s Open Space and Conservation Chapter that seek to avoid or mitigate an environmental effect.

### **Infrastructure and Public Service Chapter**

The Infrastructure and Public Services Chapter of the Framework Element addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forest and two traffic signals at the project driveways. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the

future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

The Project's consistency with the Framework Element's Infrastructure and Public Services Chapter is discussed in **Table 5.11-2**. As described therein, the Project would comply with the City's grading permit regulations, which require the preparation of an erosion control plan. The Project would also be required to comply with the City's LID Ordinance, which would require the implementation of BMPs to collect, detain, and treat runoff on-site. As discussed under Checklist Section 19, Utilities and Service Systems, of this SCEA, LADWP would be able to meet the water demand for the Project as well as existing and planned water demands of its future service area. Furthermore, the Project would not exceed the available capacity within the water distribution infrastructure that would serve the Project Site and no system upgrades would be required as a result of the Project. Thus, the Project would be generally consistent with the applicable objectives and policies that support the goals set forth in the Framework Element's Infrastructure and Public Services Chapter that seek to avoid or mitigate an environmental effect.

### **Conservation Element**

The Conservation Element primarily addresses the preservation, conservation, protection, and enhancement of the City's natural resources, including agricultural lands, archaeological and paleontological resources, endangered species, habitat areas, and mineral resources. The Conservation Element also recognizes the City's responsibility for identifying and protecting its cultural and historical heritage.

As previously described, the Project Site is vacant and does not contain any natural resources. As discussed throughout this SCEA, the Project would have no significant impact on agricultural lands, endangered species, habitat areas, or mineral resource areas.

In addition, as discussed under Checklist Section 4, Biological Resources, above, the trees and landscaping within the Project Site are not subject to the City's Protected Tree and Shrub Ordinance.

With respect to historic resources, as discussed under Checklist Section 5, Cultural Resources, of this SCEA, none of the potential historical resources in the vicinity of the Project Site would be directly or indirectly affected by the Project as they are physically separated from the Project Site and the primary public views and general character of these resources would remain unchanged by the Project. The Project would also implement the City's standard conditions of approval to ensure that potential impacts to archaeological, paleontological, and tribal cultural resources would remain less than significant.

Furthermore, as analyzed under Checklist Section 1, Aesthetics, of this SCEA, the Project would not obstruct or remove access to natural and scenic vistas. Thus, the Project would not conflict with Section 15 of the Conservation Element, which encourages protection of scenic vistas and the preservation of public views of visual resources. Overall, as outlined above, the Project would

not conflict with the Conservation Element.

### **Housing Element**

The 2021–2029 Housing Element (Housing Element), which was adopted on November 24, 2021, and subsequently amended by the City Council on June 14, 2022, identifies the City’s housing conditions and needs; establishes the goals, objectives, and policies that are the foundation of the City’s housing and growth strategy; and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The goals of the Housing Element are as follows:

- Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs;
- Goal 2: A City that preserves and enhances the quality of housing and provides greater housing stability for households at all income levels;
- Goal 3: A City in which housing creates healthy, livable, sustainable, and resilient communities that improve the lives of all Angelenos;
- Goal 4: A City that fosters racially and socially inclusive neighborhoods and corrects the harms of historic racial, ethnic, and social discrimination of the past and present; and
- Goal 5: A City that is committed to preventing and ending homelessness.

The Project’s consistency with the applicable goals, policies, and objectives set forth in the Housing Element is analyzed in **Table 5.11-2**. As described therein, the Project would construct 327 residential units of various sizes and would set aside 41 units for Very Low-Income Households (i.e., 15 percent of the total project units). These units would consist of a mix of 13 studios, 230 one-bedroom units, 79 two-bedroom units, and 5 3-bedroom units in varying sizes and configurations and at different price points, thereby directly providing a diverse range of new housing opportunities for the City’s residents.

The Project would provide these new housing opportunities for residents in a diverse residential and commercial environment, while also enabling residents to utilize existing transit infrastructure provided by Metro and LADOT. Additionally, the Project would further contribute to an active pedestrian environment through its landscaping and other streetscape improvements. Also, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy, water usage, and waste generation, thereby reducing associated GHG emissions and minimizing the impact on natural resources and infrastructure. Therefore, as detailed in **Table 5.11-2**, the Project would be consistent with the applicable objectives and policies set forth in the Housing Element.

### **Transportation Element/Mobility Plan 2035**

The Mobility Plan, adopted on January 20, 2016 and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. Accordingly, the goals of the

Transportation Chapter of the Framework Element are now implemented through the Mobility Plan.

The overarching goal of the Mobility Plan is to achieve a transportation system that balances the needs of all road users. The Mobility Plan incorporates “complete streets” principles. In 2008, the California State Legislature adopted Assembly Bill (AB) 1358, The Complete Streets Act, which requires local jurisdictions to “plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context.” The Mobility Plan includes the following five main goals that define the City’s high-level mobility priorities:<sup>159</sup>

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

Each of the goals contains objectives and policies to support the achievement of those goals. The Project would be consistent with the relevant objectives and policies that support the goals of the Mobility Plan, as detailed in **Table 5.11-2**. Specifically, the Project would support the Mobility Plan policy to provide for safe passage of all modes of travel during construction by implementing a Construction Traffic Management Plan pursuant to **Project Design Feature PDF-TRAN-1**, which would incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets.

The Project would improve pedestrian accessibility within and around the Project Site by providing new landscaping, walkways, and sidewalks that meet their designated width. The access points on Sunset Boulevard would require new curb cuts to accommodate ingress and egress maneuvers, thereby reducing the total vehicle conflict points with pedestrians. Each driveway would be designed to provide safe access for pedestrians. Also, the Project’s proximity to a variety of public transit options would provide residents, workers, and visitors convenient access to transit services. Therefore, the Project would be generally consistent with the applicable policies that support the goals and objectives set forth in the Mobility Plan.

### **Silver Lake-Echo Park-Elysian Valley Community Plan**

The Silver Lake-Echo Park-Elysian Valley Community Plan (Community Plan) is one of 35 community plans established for different areas of the City to implement the policies of the General Plan Framework Element. The Project would preserve and enhance the positive characteristics of existing residential neighborhoods while providing a variety of compatible new

<sup>159</sup> Los Angeles Department of City Planning, Mobility Plan 2035, September 2016.

housing opportunities and improve the function, design and economic vitality of the commercial corridors. The Project will also advance a number of other objectives, goals and policies of the Community Plan, as evidenced by the consistency analysis in **Table 5.11-3**. As set forth therein, the Project would be consistent with the applicable objectives and policies set forth in the Community Plan.

**Table 5.11-4**  
**Consistency with Applicable Objectives and Policies of the Community Plan**

Objectives, Policies	Analysis of Project Consistency
<p><b>Policy 1-1.1:</b> Maintain an adequate supply and distribution of multiple family, low income and special needs housing opportunities in the Community Plan Area.</p> <p><b>Policy 1-1.2:</b> Improve the quality of existing single family and multiple family housing throughout the Plan Area.</p> <p><b>Objective 1-4:</b> Promote and ensure the provision of adequate housing for all persons, including special needs populations, regardless of income, age or ethnic background.</p> <p><b>Policy 1-4.2:</b> Promote mixed-use housing projects in pedestrian-oriented areas and designated Mixed Use Boulevards, Neighborhood Districts and Community Centers to increase supply and maintain affordability.</p>	<p><b>Consistency.</b> The Project will enhance existing and future residential mixed-use development in the neighborhood by providing an attractive, modern and sustainable building for residents across all income levels with on-site retail that is accessible to nearby public transit opportunities. The Project will increase the supply of housing and maintain affordability in the community by adding 327 residential units to the current housing stock, including 13 studios, 230 one bedrooms, 79 two-bedrooms, and five (5) three-bedrooms.</p>
<p><b>Policy 1-1.3:</b> Protect existing single family residential neighborhoods from new out-of-scale development.</p>	<p><b>Consistent.</b> The Site is surrounded by commercial and multi-family residential zones and uses and is not located near a single-family zoned neighborhood. Properties to the west on Sunset Boulevard are zoned C2-1VL and developed with multi-family residential and commercial uses. Properties to the south along Sunset Boulevard are also zoned C2-1VL and developed with commercial and retail uses, an auto repair shop, and multi-family housing. Properties to the north on Sunset are zoned C2-1VL and developed with commercial and retail uses that include a restaurant, auto shop, offices, various retail shops, multi-family housing.</p> <p>Properties to the east are zoned R3-1VL and developed with multi-family housing buildings along Everett Street.</p> <p>The topography of the Site rises steeply from Sunset Boulevard to the rear of the Site in the northwest corner. The proposed buildings are notched into the hillside and significant portions of the buildings will be located at an</p>

	<p>elevation lower than the heights of the residential buildings located along Everett Street. In addition, the proposed buildings are compatible and lower in height than the existing eight-story building located adjacent to the east of the Site at 1111 West Sunset which is currently being converted into residential uses.</p>
<p><b>Policy 1-1.4:</b> Encourage new infill residential development that complements existing development and architectural style.</p> <p><b>Policy 1-1.7:</b> Promote the unique quality and functionality of the Community Plan Area’s mixed single and multiple family residential neighborhoods by encouraging infill development that continues to offer a variety of housing opportunities that capitalize on the eclectic character and architectural styles of existing development.</p> <p><b>Policy 1-3.1:</b> Seek a higher degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.</p>	<p><b>Consistent.</b> The Project is an infill mixed-use development that complements existing development and architectural style. The Site is currently vacant, and the Project would redevelop with the Site with an attractive multi-use development with ground floor retail and restaurant uses. Redevelopment of the Site will help transform the neighborhood and the portion of Sunset located between Downtown and Echo Park. It also takes advantage of the Site’s location along a major boulevard creating a pedestrian-friendly street with commercial uses along Sunset Boulevard that would help transform the neighborhood and the portion of Sunset located between Downtown and Echo Park.</p> <p>The ground floor of Building A is defined with a clearly residential scale by incorporating stoop type ground floor dwelling units with individual entries that are accessed directly from Sunset Boulevard and feature landscaping, and individual patios as well as a main lobby with an associated plaza and large retail space. Building B provides an additional retail space as well as a focal point restaurant and large outdoor plaza. The two buildings create a unified street frontage that activates Sunset Boulevard and ensures engagement with the pedestrian environment at an appropriate and visually appealing architectural scale at the ground level.</p> <p>The Project has considered the diversity of building styles in the neighborhood and proposes a cohesive palette that pays homage to the diversity of styles that exist. The Project represents a clean, compelling visual narrative that is forward-looking while being mindful of its surroundings. The buildings use staggered balconies and window openings to create façade differentiation and a dynamic building façade. The buildings use white as an accent color to disguise the mass along the street frontages.</p> <p>The Project supports walkability by providing by providing ground floor residential units with individual entries with direct access from Sunset Boulevard and private balconies. The project will enhance the surrounding streetscape by incorporating new street trees and landscape planters and providing new sidewalks. The project also incorporates landscape elements throughout</p>

	<p>the building that reduce energy use and enhances livability for the residents. Three large roof terraces are also proposed with additional landscaping and seating areas. The primary access to the building’s main lobby is from Sunset Boulevard.</p> <p>The Project design also takes into account the challenging topography of the Site. The building massing has been carefully stepped into the hillside and terraces back to the northeast corner of the Site. Three levels of the Project are buried into the existing slope at the rear in order to minimize the building height and to preserve the views for the neighboring properties on Everett Street.</p> <p>At Building B where the structure sits at the corner of Sunset and Everett, the back of house functions for the commercial space are buried into the hillside and the residential volumes step along the sloping site to achieve compatibility with the neighboring apartment buildings further up the street along Everett Street.</p>
<p><b>Objective 1-2:</b> Reduce automobile trips in residential areas by locating new housing in areas offering proximity to goods, services and facilities.</p> <p><b>Policy 1-2.1:</b> Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate this development.</p> <p><b>Policy 2-1.1:</b> New commercial uses shall be located in established commercial areas, emphasizing more intense and efficient use of existing commercial land, ultimately contributing to and enhancing the existing urban form and village atmosphere.</p> <p><b>Program:</b> The Plan encourages commercial projects that constitute more efficient use or re- use of obsolete or underused commercial structures or commercially designated land. To promote efficient land use, the Plan, moreover, encourages mixed-use development in designated areas (see Policy 2-4.3 and Figures 1 and 2).</p> <p><b>Policy 2-2.1:</b> Preserve existing pedestrian-oriented areas.</p>	<p><b>Consistent.</b> Given its location between Downtown and Echo Park, its location along Sunset Boulevard and its zoning, this Site is currently vacant. As such, it contains no pedestrian-oriented use, and is incongruous with the Community Plan mixed-use vision for Sunset Boulevard.</p> <p>The Project will redevelop the Site with a mixed-use, transit-oriented building that will serve a wide-variety of neighborhood needs and create pedestrian activity on adjacent streets. The Project will provide housing across all income levels and will add neighborhood-serving commercial uses to Sunset Boulevard. Future residents will be able to take advantage of the site’s proximity to other neighborhood services in the area as well as major transit lines that run on Sunset Boulevard. Further, the Site is only a short distance to the Downtown employment center. Thus, consistent with the foregoing objective, policies and program of the Community Plan, the Project will bring increased density and pedestrian activity to this mixed-use neighborhood on a currently under-utilized site, ultimately enhancing the urban form and village atmosphere of the area.</p>

<p><b>Policy 2-2.2:</b> New developments in pedestrian-oriented areas should add to and enhance existing pedestrian street activity.</p> <p><b>Policy 2-2.3:</b> The first floor street frontage for structures, including mixed-use projects and parking structures located in pedestrian-oriented areas, should incorporate commercial uses.</p>	
<p><b>Policy 1-3.3:</b> Consider factors such as neighborhood character and identity, compatibility of land uses, impacts on services and public facilities and impacts on traffic levels when changes in residential densities are proposed.</p> <p><b>Policy 1-6.4:</b> Ensure that any proposed development be designed to enhance and be compatible with adjacent development.</p> <p><b>Policy 2-3.1:</b> Proposed developments should be designed to enhance and be compatible with existing adjacent development.</p>	<p><b>Consistent.</b> The Project is designed to enhance and be compatible with existing adjacent development. As discussed above, the building’s aesthetic takes into account factors such as neighborhood character and identity. The Site’s topography dictates the form of the building such that it is compatible with adjacent land uses. Trash receptacles and loading areas will be strategically located on the Site and screened from public view to the extent possible to minimize any potential impacts to adjacent properties.</p> <p>Project impacts on services and public facilities and impacts on traffic levels have been studied as part of the environmental review for this project and have been determined to be less than significant. Thus, the Project will be consistent with Policies 1-3.3, 1-6.4 and 2-3.1 of the Community Plan.</p>
<p><b>Objective 2-3:</b> Enhance the appearance of existing commercial districts.</p> <p><b>Program:</b> Chapter V of this Plan includes urban design guidelines for individual commercial projects and mixed-use projects. The Plan generally recommends that pedestrian oriented areas be preserved, that building walls be maintained, active uses be required on the street level and that parking be located at the rear of the property or underground.</p> <p><b>Policy 2-4.2:</b> Require that mixed-use projects and development in pedestrian-oriented areas be designed and developed to achieve a high-level of quality, distinctive character and compatibility with existing uses.</p>	<p><b>Consistent.</b> The Project will comply with the Community Plan Urban Design chapter’s applicable policies for mixed-use, commercial and multi-family residential projects. The Project will enhance the appearance of the existing commercial district in this area by developing a vacant site with 327 residential units and ground floor commercial space.</p> <p>The building will be inviting to pedestrians as its walls along Sunset Boulevard and Everett Street will consist of storefront glazing that is recessed from the setback line to provide a transparency that opens the building to the street. Pedestrian entrances to the retail uses will be conveniently located along Sunset Boulevard. In addition, the Project will include abundant street level landscaping, and new street trees lining Sunset Boulevard and Everett Street in order to create identity and a sense of place for the building. In addition, a large plaza is provided at the corner of Sunset Boulevard and Everett Street that will activate the corner and create a more pedestrian friendly environment for visitors and passersby.</p> <p>The ground floor of Building A is defined with a clearly residential scale by incorporating stoop type ground floor dwelling units with individual entries that are accessed</p>

	<p>directly from Sunset Boulevard and feature landscaping, and individual patios as well as a main lobby with an associated plaza and large retail space. Building B provides an additional retail space as well as a focal point restaurant and large outdoor plaza.</p> <p>The two buildings create a unified street frontage that activates Sunset Boulevard and ensures engagement with the pedestrian environment at an appropriate and visually appealing architectural scale at the ground level.</p> <p>The Project has considered the diversity of building styles in the neighborhood and proposes a cohesive palette that pays homage to the diversity of styles that exist. The Project represents a clean, compelling visual narrative that is forward-looking while being mindful of its surroundings. The buildings use staggered balconies and window openings to create façade differentiation and a dynamic building façade. The buildings use white as an accent color to disguise the mass along the street frontages.</p>
<p>Silver Lake-Echo Park-Elysian Valley Community Plan: <a href="https://planning.lacity.org/odocument/e87507ac-8c40-49a0-aa1c-21df963f2298/Silver_Lake-Echo_Park-Elysian_Valley_Community_Plan.pdf">https://planning.lacity.org/odocument/e87507ac-8c40-49a0-aa1c-21df963f2298/Silver_Lake-Echo_Park-Elysian_Valley_Community_Plan.pdf</a></p>	

### Main Conditional Use Permit

The Site is currently vacant with buildings demolished. The Property is proposed to be redeveloped as an attractive mixed-use building with 327 residential dwelling units, including 41 units reserved for affordable housing units, and 9,462 square feet of ground floor commercial indoor and outdoor space available for on-site restaurant uses. Redevelopment of the Site will help transform the neighborhood, and the portion of Sunset Boulevard located between Downtown and Echo Park, by creating a pedestrian-friendly street with commercial uses along a major boulevard. As such, the Project will enhance the neighborhood through the addition of much needed housing in the City with a variety of unit sizes, as well as ground floor retail and dining space that will enhance the existing area and support local businesses along Sunset Boulevard and Everett Street.

The ground floor of Building A is defined with a clearly residential scale by incorporating stoop type ground floor dwelling units with individual entries that are accessed directly from Sunset Boulevard, featuring landscaping, individual patios, a main lobby with an associated plaza, and large retail space that may be divisible into up to 3 smaller spaces, plus some outdoor areas potentially available for outdoor dining.

Building B provides two additional retail spaces, including a focal point restaurant, and a large outdoor public plaza at the intersection of Sunset Boulevard and Everett Street. The two buildings create a unified street frontage that activates Sunset Boulevard with ground floor retail and

restaurant uses, and ensures engagement with the pedestrian environment at an appropriate and visually appealing architectural scale at the ground level, enhancing the built environment.

The proposed restaurant uses would be a desirable public convenience and welfare as the uses are in a convenient infill location accessible to nearby workers, residents, and visitors. The Project would provide convenient eating and shopping places to serve employees, residents, and visitors in the area, and add to the number of available dining venues in the neighborhood. The offering of food and alcohol in conjunction with the proposed uses would be a benefit as an amenity to current and future residents and visitors and would also serve as an attraction and amenity to future residents and guests, as other residential projects are also in development in proximity.

A variety of commercial uses is an intrinsic part of the service amenities that are necessary for the success of a vibrant neighborhood. The ability for the Site to offer a full line of alcoholic beverages would allow the restaurants to remain competitive with other similar uses servicing the same area, as alcohol service is common and expected by patrons as part of these commercial uses. Further, patrons are drawn to the surrounding area due to shopping, entertainment, and dining experiences available to them. Offering a full line of alcoholic beverages at these uses on the Project Site would enhance the dining and entertainment experience for visitors, employees, and residents in the vicinity. Further, the on-site consumption of alcohol is a common and expected component of restaurants, which would provide a functional and beneficial service to patrons visiting the area. In light of the above, the Project would perform a function that enhances the character of Echo Park and is appropriate with the area's substantial residential and commercial growth that has occurred in the past decade.

As such, the on-site service of alcoholic beverages at up to five establishments and 375 indoor and outdoor seats within the Project's restaurants and retail uses, as part of the mixed-use development would enhance the built environment in the surrounding neighborhood, and would provide a function that is beneficial and compatible with the character of the surrounding community, city, and commercial viability of the region as a whole.

### **Los Angeles Zoning Code**

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

The Property is zoned C2-1VL and is designated for General Commercial land uses by the General Plan. Corresponding Zones for this designation are RAS3, CR, C1.5, C2, C4, and P. In addition to commercial uses, the C2 zone permits residential uses at one (1) dwelling units per 400 square feet of lot area. The "1VL" suffix corresponds to the Height District 1VL, which in the C Zone permits a base 1.5:1 Floor Area Ratio (FAR) and a maximum height of 45 feet.

Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following:<sup>160</sup>

- 1) **Density Bonus Compliance Review (DB)**, pursuant to LAMC Section 12.22 A.25(g)(3), for a Project having 327 residential dwelling units, including 41 units reserved for Very Low Income households, with the following On and Off-Menu Incentives:
  - a) **On Menu Incentive**, for an increase in the Floor Area Ratio (FAR) to 3.0:1 in lieu of the otherwise allowable maximum of 1.5:1 in the C2-1 Zone.
  - b) **Off-Menu Incentive**, for a 30% reduction in open space to allow 24,540 in lieu of the otherwise required 35,050 square feet.
  - c) **Off Menu Incentive**, for additional height and stories:
    - for Building A, for a 34-foot height increase for a height of 91 feet as measured from grade, (57 feet plus 34 feet) and an 85-foot height as measured from Plumb Height (45 feet plus 40 feet) and seven stories in lieu of the otherwise allowed three stories; and
    - for Building B, for a 29-foot height increase for a height of 86 feet as measured from grade (57 feet plus 29 feet) and an 81.5-foot height as measured from Plumb Height (45 feet plus 36.5 feet) and seven stories in lieu of the otherwise allowed three stories.
- 2) **Site Plan Review (SPR)** pursuant to LAMC Section 16.05, for a development project that results in an increase of 50 or more dwelling units and/or guest rooms.
- 3) **Main Conditional Use Permit (MCUB)**, pursuant to LAMC Section 12.24.W.1 of Chapter 1 and LAMC Section 13.B.2.2 of Chapter 1A, to allow the sale and dispensing of a full line of alcoholic beverages for on-site and off-site consumption, in conjunction with a total of 9,462 square feet of potential indoor and outdoor restaurant space for up to five establishments with up to 300 indoor seats, and 75 outdoor seats, for a total of up to 375 patrons.
- 4) Approval of a **Haul Route** for a project located within a Special Grading Area with greater than 1,000 cubic yards of export.

As discussed in Section 3, Project Description, of this SCEA, the proposed residential and commercial uses would be consistent with the types of uses permitted by the current zoning and with the types of uses surrounding the Project Site. With the approval of the above requests, the Project would not conflict with the LAMC.

Overall, based on the above, the Project would not conflict with the 2020–2045 RTP/SCS, LAMC, Silver Lake-Echo Park-Elysian Valley Community Plan, or the City of Los Angeles General Plan. Therefore, the Project would not cause a significant environmental impact due to a conflict with

<sup>160</sup> [Attachment A Findings](#), Applicant, March 4, 2024.

any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** The cumulative analysis takes into consideration the nine Related Projects within 0.5 mile of the Project Site. The Related Projects primarily consist of infill development. As such, similar to the Project, the proposed construction associated with the Related Projects would be confined to the Related Project sites and would not physically divide a community. The uses proposed by the Related Projects, including mixed-use, commercial, and residential projects, would also be compatible with the various uses throughout the Project Site.

In addition, as with the Project, the Related Projects would be required to comply with relevant land use plans, policies, and regulations. Because the approval of the Project would not result in land use and planning impacts, the Project's potential impacts would not be cumulatively considerable. Furthermore, the Related Projects would also have to demonstrate that they do not conflict with applicable land use plans.

As such, based on the above, cumulative impacts related to the physical division of an established community and cumulative impacts related to conflicts with land use plans, policies, or regulations would be less than significant.

## 1.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<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"/>

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects.
- b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as:
  - 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.
  - 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site.
  - 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate

resources following completion of the improvement and during long-term operations.

- 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.

### ***Applicability to the Project***

The Project would not result in the loss of availability of a regionally valuable mineral resource. Therefore, **PMM MIN-1** is not applicable to the Project.

### **Impact Analysis**

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

**No Impact.** No mineral extraction operations currently occur on the Project Site and none are proposed by the Project. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low.

The Project Site is located within the LA City Oil Field, which is one of 25 city designated major oil drilling areas. This designation is a broad swath of land generally from Vermont Avenue in the west to the I-110 Freeway to the east, and from Third Street and Dodger Stadium area in the north to Wilshire Boulevard in the south.<sup>161</sup>

According to California Department of Conservation maps, no oil wells exist on the Project Site.<sup>162</sup> The nearest wells (API 03725883, API 03725884, and API 03725886) are identified as Buried-Idle and were located two blocks south of the Site at the corner of Sunset Boulevard and Bellevue Avenue. Much of the area identified has been developed with structures and is inaccessible for mining extraction. Furthermore, the Site is surrounded by dense urban uses, hilly roads, and sensitive residential receptors. Therefore, the Project would not exacerbate environmental hazards relative to oil wells.

Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone (MRZ) or Surface Mining District where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey.<sup>163,164,165</sup> Much of

<sup>161</sup> Geotechnical, Oil/Gas Fields layer, <https://navigatela.lacity.org/navigatela/>, accessed October 5, 2023.

<sup>162</sup> California Department of Conservation Wellfinder map: <https://maps.conservation.ca.gov/doggr/wellfinder/>, accessed October 5, 2023.

<sup>163</sup> City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995. Figure GS-1.

<sup>164</sup> State of California Department of Conservation, California Geologic Survey, Aggregate Sustainability in California, 2018.

<sup>165</sup> City of Los Angeles, Conservation Element of the Los Angeles City General Plan, January 2001, Exhibit A, p. 86.

the area within the MRZ sites in Los Angeles was developed with structures prior to the MRZ classification and, therefore, are unavailable for extraction.<sup>166</sup> The Site is not within an MRZ. Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance. Therefore, the Project would not result in the loss of availability of a known mineral resource, and no impact would occur.

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

**No Impact.** No mineral extraction operations currently occur on the Project Site. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey. According to the Conservation Element of the City of Los Angeles 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 flood plain from the San Fernando Valley through downtown Los Angeles. Much of the area identified has been developed with structures and is inaccessible for mining extraction.<sup>167</sup>

Furthermore, the Site is surrounded by dense urban uses, hilly roads, and sensitive residential receptors. Thus, the Site would not be an adequate candidate for mineral extraction. Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and no impact would occur.

### **Cumulative Impacts**

**Less Than Significant Impact.** The nine Related Projects are located within a developed, urbanized area of the City and do not support existing or future mineral extraction. It is unknown whether or not any of the Related Project sites contain mineral resources of local or regional importance. Regardless, since the Project would have no impact on the availability of known mineral resources, it would not contribute to a potential cumulative impact.

As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and there would be no cumulative impact.

<sup>166</sup> City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58.

<sup>167</sup> City of Los Angeles, Conservation Element of the General Plan, September 16, 2001; pg II-57.

# 1.13 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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"/> |

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

**I-1** Noise Technical Report and Technical Appendix, DKA Planning, October 2023

**I-2** Vibration Technical Report and Technical Appendix, DKA Planning, October 2023

**SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM NOI-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Install temporary noise barriers during construction.
- b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
- c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.

- d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- f) Designate an on-site construction complaint and enforcement manager for the project.
- g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
- h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.
- j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.
- k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where repavement is planned.
- l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier

drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

- m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses.
- n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.
- o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
- p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.
- q) Use of portable barriers in the vicinity of sensitive receptors during construction.
- r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.
- s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.
- t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.
- u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.
- v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers,

or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

- w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.
- y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

### ***Applicability to the Project***

As described below, while the Project does not have the potential to result in significant noise impacts related to Project operation, there is a potential for significant construction-related noise impacts to occur. Therefore, the Project would implement Project-specific **Mitigation Measures MM-NOI-1** through **MM-NOI-3**, which would be equal to or more effective than the measures outlined in **PMM NOI-1**. Thus, **PMM NOI-1** would not be incorporated into the Project.

**PMM NOI-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.
- b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.
- c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

- d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.
- e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

### ***Applicability to the Project***

As analyzed below, the Project would not result in significant impacts related to vibration. In addition, the Project would not require pile driving. Moreover, the remaining measures outlined in **PMM NOI-2** would apply to the Project either through compliance with existing regulatory requirements (e.g., restriction of construction hours and prohibition of extended idling) or through implementation of Project-specific mitigation (e.g., **MM-NOI-3**'s requirement for use of noise suppression measures), which would be equal to or more effective than the measures outlined in **PMM NOI-2**. Thus, **PMM NOI-2** would not be incorporated into the Project.

### **Impact Analysis**

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

### **Less Than Significant Impact with Mitigation Incorporated**

#### **Existing Noise Environment**

Some land uses are considered more sensitive to noise than others based on the types of activities typically involved at the receptor location. The City's Noise Element defines noise-sensitive land uses as single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodging, and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves; and parks.

Six off-site noise receptor locations in proximity to the Project were selected, representing the nearest noise sensitive uses surrounding the Project Site. Noise-sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, Everett Street (west side); as close as five feet east of the Project Site.
- Residential structures<sup>168</sup>, 1251-1255 Sunset Boulevard, five feet north of the Project Site.

<sup>168</sup> Note these structures are abandoned and have been since at least early 2021. However, for conservative analysis, this analysis assumes these could be sensitive receptors that could be re-occupied.

- Residences, Everett Street (east side); 60 feet east of the Project Site.
- Residences, Sunset Boulevard (west side); as close as 100 feet west of the Project Site.
- Residences, 1190 Sunset Boulevard; 110 feet west of the Project Site.
- Residences, 1271 Sunset Boulevard; 200 feet north of the Project Site.
- Everett Park, 250 feet east of the Project Site.
- Preschool, 707 Kensington Road; about 500 feet west of the Project Site.

The Project Site is currently vacant of any structures. As such, there is no noise generated at the Project Site.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.<sup>169</sup> This includes traffic on Sunset Boulevard, which carries about 2,857 north- and southbound vehicles at Everett Street in the A.M. peak hour.<sup>170</sup>

In February 2023, DKA Planning took short-term noise measurements near the Project Site to determine the ambient noise conditions of the neighborhood near sensitive receptors.<sup>171</sup> The ambient noise measurements were taken in accordance with the City’s standards, which require ambient noise to be measured over a period of at least 15 minutes.

As shown in **Table 5.13-1**, noise levels along roadways near the Project Site ranged from 62.7 dBA  $L_{eq}$  on Everett St to 74.7 dBA  $L_{eq}$  on Sunset Boulevard, noise levels that are generally consistent with the traffic volumes on the applicable street(s).

Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Sunset Boulevard). Consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

**Figure 5.13-1** illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-hour CNEL noise levels are generally considered “Conditionally Acceptable” and “Normally Unacceptable” for the types of land uses near the Project Site.

<sup>169</sup> World Health Organization, <https://www.who.int/docstore/peh/noise/Comnoise-2.pdf> accessed March 18, 2021.

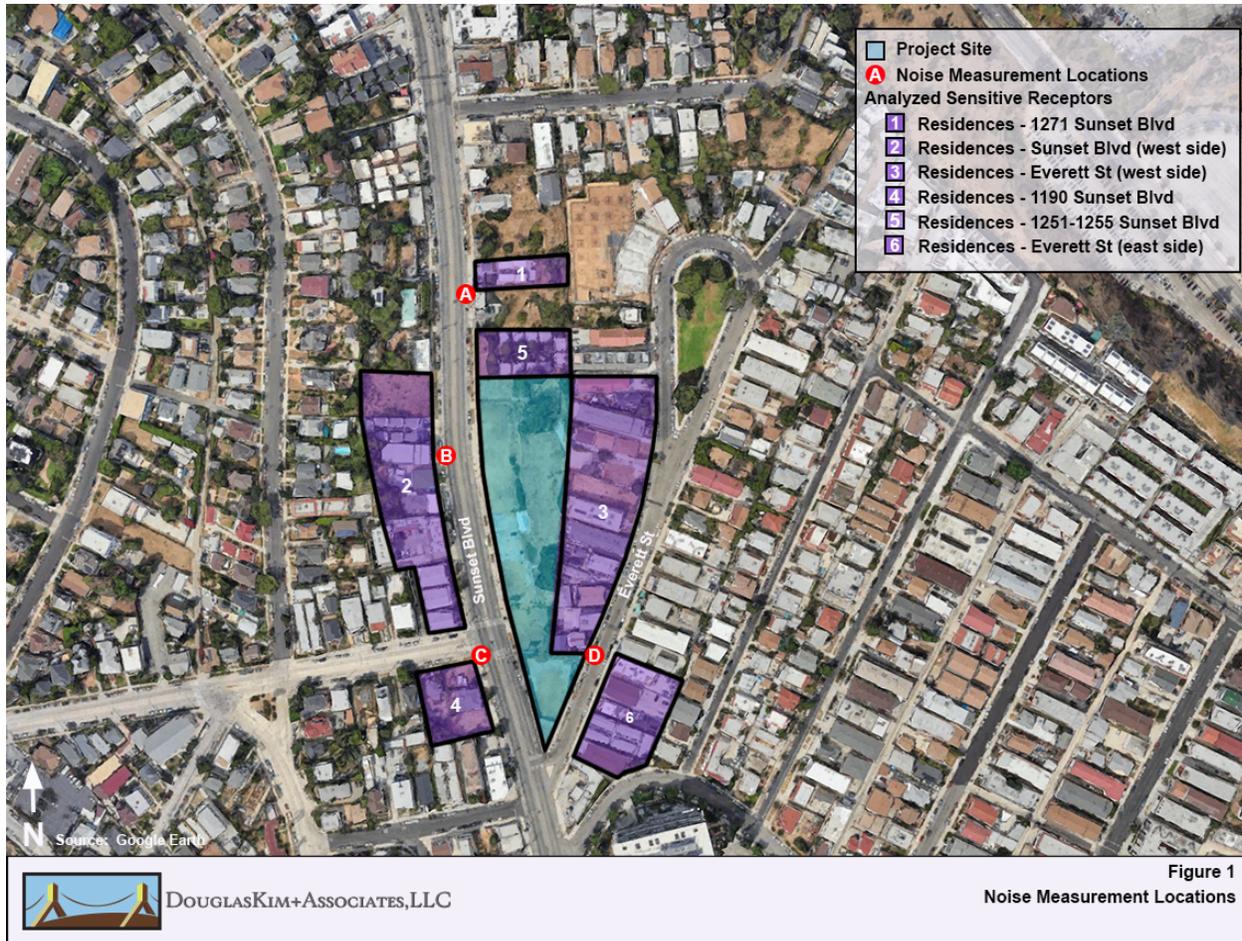
<sup>170</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>171</sup> Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day’s measurements, and set at approximately five feet above the ground.

**Table 5.13-1  
Existing Noise Levels**

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility <sup>b</sup>
		dBA (L <sub>eq</sub> )	dBA (CNEL) <sup>a</sup>		
A. 1257 Sunset Bl.	Traffic on Sunset Bl.	71.4	69.4	1. Residences, 1271 Sunset Bl.; 5. Residences, 1251-1255 Sunset Bl.	Conditionally Acceptable
B. 1235 Sunset Bl.	Traffic on Sunset Bl.	74.7	72.7	2. Residences, Sunset Bl. (west side)	Normally Unacceptable
C. 1190 Sunset Bl.	Traffic on Sunset Bl.	72.5	70.5	4. Residences, 1190 Sunset Bl.	Normally Unacceptable
D. 941 Everett St.	Traffic on Sunset Bl.	62.7	60.7	3. Residences, Everett St. (west side); 6. Residences, Everett St. (east side)	Conditionally Acceptable
<sup>a</sup> Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4. <sup>b</sup> Pursuant to California Office of Planning and Research “General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 above for definition of compatibility designations. Source: DKA Planning, 2023					

**Figure 5.13-1  
Noise Measurement Locations**



## Construction Noise

### On-Site Construction

Construction would generate noise during the construction process that would span 30 months of demolition, site preparation, grading, utilities trenching, building construction, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., site preparation, trenching, building construction, architectural coatings), noise impacts are generally lesser because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts,

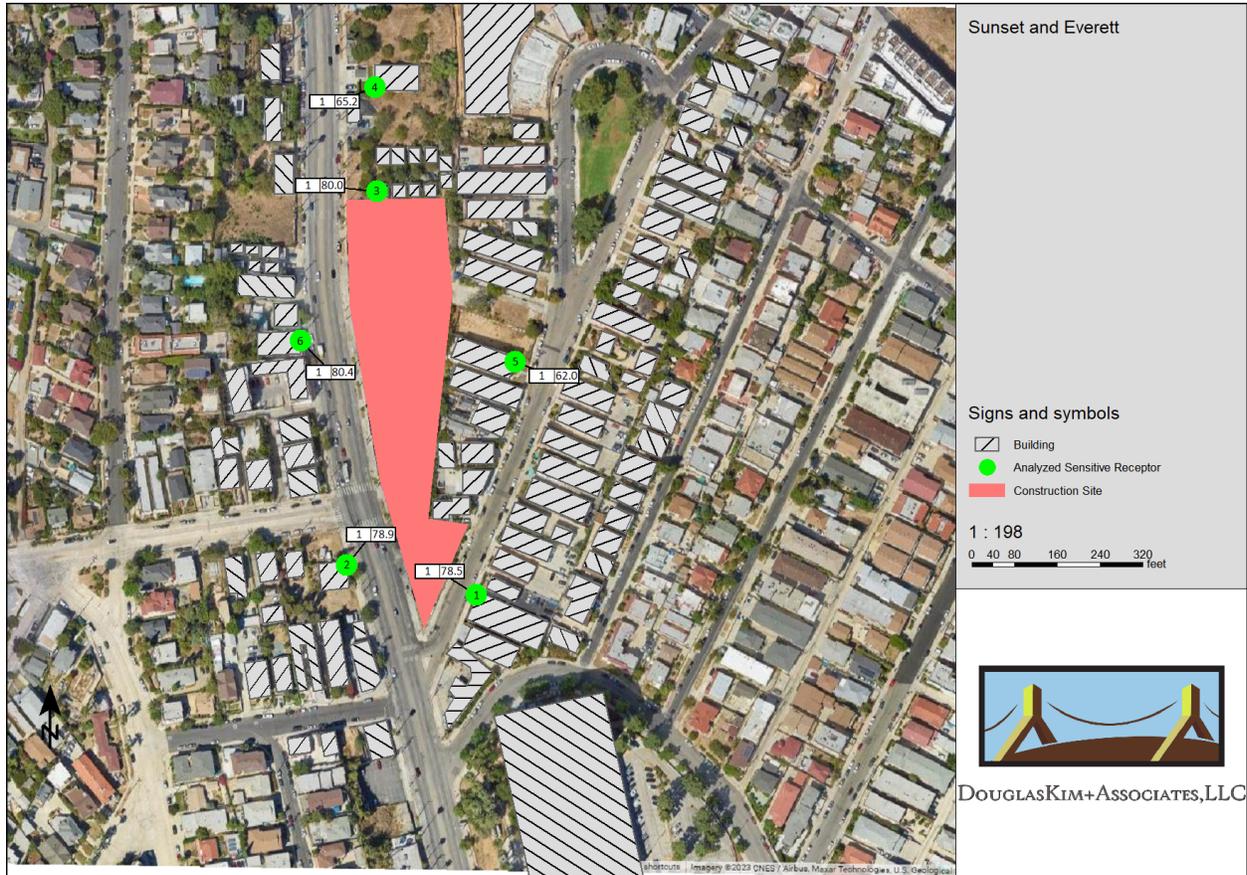
generators, and various powered hand tools and pneumatic equipment would often be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. **Figure 5.13-2** illustrates construction noise levels during the demolition and grading phases.

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels. As shown in **Table 5.13-2**, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise levels anywhere from 0.9 dBA  $L_{eq}$  to 15.9 dBA  $L_{eq}$  at the six analyzed sensitive receptors during the building construction phase, where approximately twenty pieces of equipment could concurrently operate. These construction noise levels would exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would be significant prior to implementation of mitigation.

**Table 5.13-2**  
**Construction Noise Impacts at Off-Site Sensitive Receptors (Without Mitigation)**

Receptor	Maximum Construction Noise Level (dBA $L_{eq}$ )	Existing Ambient Noise Level (dBA $L_{eq}$ )	New Ambient Noise Level (dBA $L_{eq}$ )	Increase (dBA $L_{eq}$ )	Potentially Significant ?
1. Residences, 1271 Sunset Bl.	65.2	71.4	72.3	0.9	No
2. Residences, Sunset Bl (west side)	80.4	74.7	81.4	6.7	Yes
3. Residences, Everett St. (west side)	62.0	62.7	65.4	2.7	No
4. Residences, 1190 Sunset Bl.	78.9	72.5	79.8	7.3	Yes
5. Residences, 1251-1255 Sunset Bl.	80.0	71.4	80.6	9.2	Yes
6. Residences, Everett St. (east side)	78.5	62.7	78.6	15.9	Yes
Source: DKA Planning, 2023.					

**Figure 5.13-2**  
**Construction Noise Impacts at Sensitive Receptors (Without Mitigation)**



### Mitigation Measures

- MM-NOI-1:** Construction staging shall be located as far from sensitive receptors as possible.
- MM-NOI-2:** Temporary sound barriers capable of attenuating construction noise (e.g., construction sound barrier with sound blankets) and blocking the line-of-sight between the adjacent sensitive receptors shall be installed. Such barriers shall be capable of reducing sound pressure by at least 2.4 dBA  $L_{eq}$  at 1190 Sunset Boulevard; 4.3 dBA  $L_{eq}$  at 1251-1255 Sunset Boulevard; 1.8 dBA  $L_{eq}$  at off-site receptors to the west across Sunset Boulevard; and 11.0 dBA  $L_{eq}$  at off-site receptors at 906-924 Everett Street.
- MM-NOI-3:** All powered construction equipment shall be equipped with advanced exhaust mufflers or other noise reduction devices.

Implementation of **Mitigation Measures MM-NOI-1** through **MM-NOI-3** would substantially reduce noise exposure at all off-site sensitive receptors below a 5 dBA  $L_{eq}$  increase in ambient noise levels, as shown in **Table 5.13-3**.

**Table 5.13-3  
Construction Noise Impacts at Off-Site Sensitive Receptors (With Mitigation)**

Receptor	Maximum Construction Noise Level (dBA L <sub>eq</sub> )	Existing Ambient Noise Level (dBA L <sub>eq</sub> )	New Ambient Noise Level (dBA L <sub>eq</sub> )	Increase (dBA L <sub>eq</sub> )	Potentially Significant ?
1. Residences, 1271 Sunset Bl.	65.2	71.4	72.3	0.9	No
2. Residences, Sunset Bl (west side)	77.9	74.7	79.6	4.9	No
3. Residences, Everett St. (west side)	62.0	62.7	65.4	2.7	No
4. Residences, 1190 Sunset Bl.	75.7	72.5	77.4	4.9	No
5. Residences, 1251-1255 Sunset Bl.	74.6	71.4	76.3	4.9	No
6. Residences, Everett St. (east side)	65.9	62.7	67.6	4.9	No
Source: DKA Planning, 2023.					

### Off-Site Construction

The Project would also generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor trips; and worker commute trips during construction. These activities would generate up to an estimated 431 peak hourly PCE vehicle trips, as summarized in **Table 5.13-4**, during the building construction phase.<sup>172</sup> This would represent about 15.1 percent of traffic volumes on Sunset Boulevard, which carries about 2,857 north- and southbound vehicles at Everett Street in the A.M. peak hour.<sup>173</sup>

Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes overstates the likely traffic volumes from construction activities at this intersection.

Sunset Boulevard would serve as part of the haul route for debris and soil exported from the Project Site given its access to the Harbor and Hollywood Freeways. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Sunset Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, which is less than the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

<sup>172</sup> This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

<sup>173</sup> Transportation Assessment, Fehr & Peers, October 2023.

**Table 5.13-4  
Construction Vehicle Trips (Maximum Hourly)**

Construction Phase	Worker Trips <sup>a</sup>	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Sunset Blvd. <sup>f</sup>
Demolition	5	0	55 <sup>b</sup>	60	2.1
Site Preparation	8	0	294 <sup>c</sup>	302	10.6
Grading	20	0	291 <sup>d</sup>	311	10.9
Trenching	8	0	0	8	0.3
Building Construction	284	147 <sup>e</sup>	0	431	15.1
Architectural Coating	57	0	0	57	2.0

<sup>a</sup> Assumes all worker trips occur in the peak hour of construction activity.

<sup>b</sup> Assumes 1,344 square feet of billboard mixed debris at 10-feet of height = 498 CY divided by 10 CY haul truck capacity = 49.8 haul trucks x 2 = 100 one-way haul trips. Assumes 6,000 sq. ft. of asphalt/concrete at six inches of depth = 111 cubic yards divided by 10 CY haul truck capacity = 11.1 truck trips x 2 = 22 one-way haul trips. Thus, the project would generate 122 haul trips during demolition over a six-day period with seven-hour work days. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent. 122 haul trips x 19.1 PCE factor = 2,330 PCEs divided by 7 hours of hauling a day over 6 days = 55.5 hourly PCE trips.

<sup>c</sup> Assumes 16,028 square feet of vegetative debris at 10 feet of height = 5,936 cubic yards divided by 10 CY haul truck capacity = 594 haul trucks x 2 = 1,187 one-way haul trips during site preparation. 1,187 haul trips x 19.1 PCE factor = 22,672 PCEs divided by 7 hours of hauling a day over eleven days = 194.4 hourly PCE trips.

<sup>d</sup> Assumes 40,000 CY of soil exported divided by 10 CY haul truck capacity = 4,000 haul trucks x 2 = 8,000 one-way haul trips during grading. 8,000 haul trips x 19.1 PCE factor = 152,800 PCEs divided by 7 hours of hauling a day over 75 days = 194.4 hourly PCE trips = 291 hourly PCE trips.

<sup>e</sup> This phase would generate about 54 vendor truck trips daily over a seven-hour work day. Assumes a blend of vehicle types and a 9.55 PCE. (54 trips x 9.55 PCE / 7 hours)

<sup>f</sup> Percent of existing traffic volumes on Sunset Boulevard at Everett Street, which carries about 2,857 north- and southbound vehicles in the A.M. peak hour. Transportation Assessment, Fehr & Peers, October 2023.

Source: DKA Planning, 2023

## Operational Noise

Noise associated with Project operation would include: (a) on site stationary source noise, including outdoor mechanical equipment (e.g., HVAC equipment), parking facilities, and activities within the proposed outdoor spaces; and (b) off-site mobile source (roadway traffic) noise.

### On-Site Operational Noise

#### Mechanical Equipment

The Project would operate mechanical equipment on each building, 91 feet above grade for Building A and 86 feet for Building B that would generate incremental long-term noise impacts. This analysis assumes the use of typical HVAC equipment heat pumps for each multi-family residence (e.g., 2.5-ton Carrier 24ABC630A003 Carrier 25HBC5), with each unit distributed across the roof as needed to serve each residence. Noise from heat pumps and air conditioners is a function of the model, airflow, and pressure flow generated by fans and compressors. Most

modern heat pumps are relatively quiet. While each unit would have a sound power of up to 76 dBA, the location on the roof would help shield the noise path to nearby sensitive receptors. As blocking the line of sight to a noise source generally results in a 5-decibel reduction, each rooftop unit would generate about 50.3 dBA at ten feet of distance.<sup>174</sup> Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties.

As summarized in **Table 5.13-5**, the operational noise impact of mechanical equipment, when combined with traffic noise from vehicles accessing the Project Site and outdoor noise sources (e.g., roof decks, pool) would not substantially elevate ambient CNEL noise levels.

Pad-mounted oil transformers that lower high voltage to standard household voltage used to power electronics, appliances and lighting would be located on the ground level in an unobstructed location fronting Sunset Boulevard at the western portion of the Project Site. These transformers are housed in a steel cabinet and generally do not involve pumps, though fans may be needed on some units. Switchgear responsible for distributing power through the development could be located externally, though no mechanical processes that generate noise would be necessary.

Otherwise, all other mechanical equipment would be fully enclosed within the structure. This can include mechanical, electrical, and plumbing rooms, a utility fan room, as well as elevator equipment (including hydraulic pump, switches, and controllers) in the subterranean basement. Vaults that house pool and spa equipment and pumps would be located in the three subterranean parking levels. All these activities would generally occur within the envelope of the development, operational noise would be shielded from off-site noise-sensitive receptors.

**Table 5.13-5  
Operational Noise Impacts at Off-Site Sensitive Receptors**

Receptor	Existing Noise Level (dBA CNEL)	Composite Noise Impact* (dBA CNEL)	New Ambient Noise Level (dBA CNEL)	Threshold of Significance (dBA CNEL)	Significant?
1. Residences, 1271 Sunset Bl.	69.4	51.1	69.5	74.4	No
2. Residences, Sunset Bl (west side)	72.7	51.1	72.7	75.7	No
3. Residences, Everett St.	60.7	42.5	60.8	65.7	No
4. Residences, 1190 Sunset Bl.	70.5	45.0	70.5	73.5	No
* Includes Project traffic near the Project Site, mechanical equipment, and outdoor noise sources. See Technical Appendix for inventory of sources. Source: DKA Planning, 2023.					

### Auto-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting the residential development from three driveways off Sunset Boulevard.

<sup>174</sup> Washington State Department of Transportation, Noise Walls and Barriers. <https://wsdot.wa.gov/construction-planning/protecting-environment/noise-walls-barriers>. Assumes the Carrier's rated sound power of 76 dB.

During the peak P.M. hour, 137 vehicles would generate noise in and out of the garage, with up to 152 vehicles using the garage in the peak A.M. hour.<sup>175</sup>

Nearby residences across Sunset Boulevard would have a direct line of sight to vehicle traveling on Sunset and accessing the Project's driveways, 100 feet or more away. The relative low number of vehicles accessing the development combined with the distance to sensitive receptors and ambient noise from traffic volumes would limit any elevation of ambient noise levels to less than 0.1 dBA CNEL, well below the 5 dBA threshold of significance for operational sources of noise.

As summarized in **Table 5.13-5** (above), the operational noise impact of traffic noise from vehicles accessing the Project Site, when combined with rooftop mechanical equipment and outdoor noise sources (e.g., roof decks, pool) would not substantially elevate ambient CNEL noise levels.

Parking garage noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. Parking garage-related noise impacts would be negligible given their location in an enclosed garage would limit any line of sight from the garage. As such, the Project's parking garage activities would not have a significant impact on the surrounding noise environment.

### Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include human conversation, recreation, trash collection, landscape maintenance, and commercial loading. These are discussed below:

- Human conversation. While noise associated with everyday residential activities would largely occur internally within the development, there could include passive activities where human conversation, socializing, and passive recreation in outdoor spaces could occur, including:
  - Ground floor plaza. A 2,100 square-foot outdoor plaza would be located at the corner of Everett Street and Sunset Boulevard outside a retail space in Building B. This would be a shared use space for outdoor dining, socializing, or passive recreation (e.g., reading), with intermittent use largely during day or evening hours.
  - Second floor interior courtyard. This would be a shared use space for socializing or passive recreation (e.g., reading, walking), with intermittent use largely during day or evening hours. No powered speakers are proposed that would amplify either speech or music.
  - Private balconies on all floors on the north, east, and south elevations. These would be private spaces for residents used for socializing or passive recreation (e.g., reading), with intermittent use largely during day or evening hours. Some of these would be recessed into the building façade, reducing the sound path on three sides,

<sup>175</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

while other open balconies would shield noise on one side. No powered speakers are proposed that would amplify either speech or music.

- Roof decks on Building B. A 1,065 square-foot deck on the western end of Building B's roof facing Sunset Boulevard and a 750 square-foot deck on the eastern end of the Building B at the corner of Sunset Boulevard and Everette Street are proposed. These use spaces for socializing, passive recreation (e.g., reading), with intermittent use largely during day or evening hours would be located about 78 feet above grade.
- Roof deck on Building A. A 3,010 square-foot deck centered on the southern edge of Building A's roof facing Sunset Boulevard is proposed, approximately 73 feet above grade. This would be a shared use space for socializing, passive recreation (e.g., reading), with intermittent use largely during day or evening hours.

The primary use of these spaces would be for human conversation, which would produce negligible noise impacts, based on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB.<sup>176</sup> For example, the sound of a human voice at 60 dB would produce a noise level of 39 dB at ten feet, which would not elevate ambient noise levels at any of the analyzed sensitive receptors by more than 0.2 dBA  $L_{eq}$ . Moreover, noise levels from human speech would attenuate rapidly with greater distance, resulting in a 33 dB noise level at twenty feet, and 27 dB at 40 feet. Further, the infrequent nature of outdoor use of these spaces and any acoustic noise (e.g., speech) makes it impossible to individually or collectively elevate 24-hour noise levels by 5 dBA CNEL or more at any nearby noise-sensitive receptors.

- Recreation. A 45,000-gallon open air pool and spa are proposed along the northern portion of the Project Site between Buildings A and B. Socializing and swimming would occur during day, evening, and occasionally during night hours.
- Trash collection. On-site trash and recyclable materials for the residents would be managed from the waste collection area within the parking garage for each building that represents street level for the sloped site. Dumpsters would be moved to the street manually or with container handler trucks that use hydraulic-powered lifts that use beeping alerts during operation. Haul trucks would access solid waste from Sunset Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA  $L_{eq}$  and 66 dBA  $L_{eq}$  could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.<sup>177</sup> Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of trash collection activities during daytime hours would negligibly affect CNEL sound levels.

<sup>176</sup> Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

<sup>177</sup> RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, two gas-powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA  $L_{eq}$  and cause nuisance or potential noise impacts for nearby receptors.<sup>178</sup> The landscape plan focuses on a modest palette of accent trees and raised planters on the ground floor and upper floors where common space (i.e., outdoor patios, roof decks) that will minimize the need for powered landscaping equipment, as some of this can be managed by hand. Because CNEL levels represent the energy average of sound levels during a 24-hour period, the modest sound power from a few minutes of maintenance activities during daytime hours would negligibly affect CNEL sound levels.
- Commercial loading. On-site loading and unloading activities would be managed within the enclosed parking garages of each building, where they would be obscured from off-site sensitive receptors. As a result, there would be negligible noise impacts on off-site receptors and impacts would not increase CNEL noise levels at off-site locations. Further, LAMC Section 114.03 would regulate loading and unloading activities between 10:00 P.M. and 7:00 A.M.

As summarized in **Table 5.13-5**, the operational noise impact of traffic noise from vehicles accessing the Project Site, operation of rooftop mechanical equipment, outdoor noise sources (e.g., roof decks, pool) would not substantially elevate ambient CNEL noise levels. As such, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL where ambient noise levels are “Conditionally Acceptable” and not more than 3 dBA CNEL where noise levels are currently considered “Normally Unacceptable.” As a result, the Project’s on-site operational noise impacts would be considered less than significant.

### Off-Site Operational (Traffic) Noise

The majority of the Project’s operational noise impacts would be off-site from vehicles traveling to and from the development. The Project would add up to 1,850 vehicle trips to the local roadway network on a peak weekday at the start of operations in 2027, including 152 and 137 vehicles entering and exiting the development during the peak A.M. and P.M. hours, respectively.<sup>179</sup> This would represent 4.7 and 4.4 percent of the 3,250 and 3,122 vehicles currently using Sunset Boulevard at Beaudry Avenue in the A.M. and P.M. peak hours, respectively.<sup>180</sup>

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA  $L_{eq}$ , the Project’s traffic would neither increase ambient noise levels 3 dBA or more into “normally unacceptable” or “clearly unacceptable” noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

<sup>178</sup> Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. These equipment generated a range of 74.0-88.5 dBA  $L_{eq}$  at 50 feet.

<sup>179</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

<sup>180</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

## Consistency with City General Plan Noise Element

While the City’s Noise Element focuses on a number of measures for Citywide implementation by municipal government, there are some objectives, policies, and programs that are applicable to development projects. **Table 5.13-6** summarizes the Project’s consistency with these.

**Table 5.13-6**  
**Project Consistency with City of Los Angeles General Plan Noise Element**

Objective/Policy/Program	Project Consistency
<b>Policy 2.2:</b> Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.	<b>Consistent.</b> The Project would comply with City, state, and other applicable noise regulations to ensure that noise impacts are considered less than significant.
<b>Objective 3</b> (Land Use Development): Reduce or eliminate noise impacts associated with proposed development of land and changes in land use.	<b>Consistent.</b> The project is being evaluated under CEQA and would result in less-than-significant impacts on noise.
<b>Program 11.</b> For a proposed development project that is deemed to have a potentially significant noise impact on noise sensitive uses, as defined by this chapter, require mitigation measures, as appropriate, in accordance with California Environmental Quality Act and city procedures.	<b>Consistent.</b> The Project would not have a significant noise impact on noise-sensitive uses and as such, would not require mitigation under CEQA.
<b>Program 12.</b> When issuing discretionary permits for a proposed noise-sensitive use (as defined by this chapter) or a subdivision of four or more detached single-family units and which use is determined to be potentially significantly impacted by existing or proposed noise sources, require mitigation measures, as appropriate, in accordance with procedures set forth in the California Environmental Quality Act so as to achieve an interior noise level of a CNEL of 45 dB, or less, in any habitable room, as required by Los Angeles Municipal Code Section 91.	<b>Consistent.</b> The noise-sensitive project is being evaluated under CEQA and would before being entitled would comply with Building Code and Title 24 noise insulation requirements to achieve an interior noise level of 45 dB.
Source: DKA Planning, 2023.	

## Conclusion

Based on the above, potential noise impacts associated with the Project construction and operation would be less than significant.

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

## Less Than Significant

## Existing Vibration Environment

In 2018, the Federal Transit Administration (FTA) published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. **Table 5.13-7** summarizes FTA’s vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

**Table 5.13-7**  
**FTA Vibration Damage Potential Threshold Criteria**

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA “Transit Noise and Vibration Impact Assessment Manual”, September 2018.	

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

The Project Site is currently vacant of any improvements. As such, there are no sources of groundborne vibration on the Project Site.

The primary source of groundborne vibration near the Project Site is vehicle travel. For example, Sunset Boulevard carries 3,250 and 3,122 vehicles at Beaudry Avenue in the A.M. and P.M. peak hours, respectively.<sup>181</sup> The blend of passenger vehicles, trucks, delivery trucks, transit buses, and other light-, medium-, and heavy-duty vehicles that travel this and other local roadways generate minimal levels of vibration. As noted by federal guidance, “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible...”<sup>182</sup> As such, vehicle movement generates

<sup>181</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

<sup>182</sup> Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

imperceptible ground vibration, with the occasional exception of heavy-duty vehicles that travel over speed bumps, potholes, and other street irregularities.

There are several buildings near the Project Site that could be exposed to groundborne vibration during construction and operation of the proposed development that include:

- Residential Structures, Everett Street (west side); one- and two-story structures as close as five feet east of the Project Site. These homes and structure would be considered Category III structures (non-engineered timber and masonry) under FTA guidelines.
- Residential Structures, 1251 Sunset Boulevard; five feet north of the Project Site. These bungalow structures would be considered Category III structures (non-engineered timber and masonry) under FTA guidelines.
- Residential and Commercial Structures, Sunset Boulevard (west side) as close as 100 feet west of the Project Site. These residences and commercial structures would be considered Category III structures (non-engineered timber and masonry) under FTA guidelines.

### On-Site Construction Vibration Impacts

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable state, County, or City standards specific to temporary construction activities. Heavy construction equipment (e.g. a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source.

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. **Table 5.13-8** summarizes vibratory levels for common construction equipment.

**Table 5.13-8**  
**Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Groundborne vibration would be generated by a number of construction activities at the Project site. As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.191 inches per second PPV are projected to occur at all three structures, as shown in **Table 5.13-9**. These impacts are below the 0.2 in/sec PPV thresholds of significance for Category III structures. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be considered less than significant.

Construction of the Project would protect adjacent properties during the excavation process by complying with California Civil Code Section 832. It would also comply with LAMC Section 91.3307 and applicable subsections that govern the protection of adjoining property.

In addition, **MM-NOI-1** for noise above, would require construction staging to be located as far from sensitive receptors as possible, which would further ensure reduced vibration levels at the receptors.

**Table 5.13-9  
Building Damage Vibration Levels – On-Site Sources**

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
<b>FTA Reference Vibration Level (25 Feet)</b>	<b>N/A</b>	<b>0.089</b>	<b>0.089</b>	<b>0.076</b>	<b>0.035</b>	<b>0.003</b>	--	--
Residential Structures, Everett St.	15	0.191	0.191	0.164	0.075	0.006	0.20 <sup>a</sup>	No
Residential Structures, 1251 Sunset Bl.	15	0.191	0.191	0.164	0.075	0.006	0.20 <sup>a</sup>	No
Residential and Commercial Structures, Sunset Bl. (west side)	110	0.020	0.020	0.017	0.008	0.001	0.20 <sup>a</sup>	No
<sup>a</sup> FTA criterion for Category III (non-engineered timber and masonry buildings) Includes ten feet of buffer from Project Site property line to allow for equipment maneuverability. Source: DKA Planning, 2023.								

### Off-Site Construction Vibration Impacts

Construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately

63 VdB (0.006 PPV) at a distance of 50 feet from the truck.<sup>183</sup> According to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.”

Nonetheless, there are buildings along the Project’s anticipated haul route on Sunset Boulevard, Beaudry Avenue, Temple Street, and other local roadways to the US-101 that are situated away from the right-of-way and would be exposed to groundborne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project’s potential to damage roadside buildings and structures as the result of groundborne vibration generated by its truck trips would therefore be considered less than significant.

### **Operational Groundborne Vibration**

The Project’s day-to-day operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce groundborne vibration and noise. Building mechanical equipment installed as part of the Project would typically include vibration-attenuation mounts to reduce vibration transmission to the building. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the parking garage.

During operation of the Project, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site’s vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps.

Due to the rapid attenuation characteristics of groundborne vibration, vibration due to Project operation at the off-site sensitive receptors would be well below the perceptible level. As a result, the Project’s long-term vibration impacts would be less than significant.

### **Conclusion**

Based on the above, groundborne vibration and groundborne noise impacts associated with the Project would be less than significant, and no mitigation is required.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The Project Site is not located within the vicinity of a private airstrip or an airport land use plan. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 11.5 miles west, Hollywood-Burbank Airport located 10.5

<sup>183</sup> Federal Transit Administration, “Transit Noise and Vibration Impact Assessment,” May 2006, Figure 7-3.

miles northwest. Thus, the Project would not expose people residing or working in the vicinity of the Project Site to excessive airport-related noise levels. Therefore, no impact would occur.

## Cumulative Impacts

**Less Than Significant Impact.** The Project, together with the Related Projects and future growth, could contribute to cumulative noise and vibration impacts. The potential for cumulative noise and vibration impacts to occur is specific to the distance between each Related Project and their stationary noise sources, as well as the cumulative traffic that these projects would add to the surrounding roadway network.

### Construction Noise

#### On-Site Construction

During construction of the proposed Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Construction-related noise levels from any Related Project would be intermittent and temporary. As with the Project, any Related Projects would comply with the LAMC's restrictions, including restrictions on construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual Related Project and compliance with the noise ordinance.

Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the L.A. CEQA Thresholds Guide screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between.

There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (**Table 5.21-1** and **Figure 5.21-1**).<sup>184</sup> Of these, two are completed (Nos. 1 and 4) and one (No. 3) is under construction and would be completed and operational by the time the Project breaks ground in 2025.

In addition, only five Related Projects are within 1,000 feet of the Project (Nos. 3, 6, 7, 8, 9). The other four Related Projects (Nos. 1, 2, 4, 5) are more than 1,000 feet from the Project Site and with intervening building structures, which and therefore would not contribute to the cumulative on-site construction noise impacts.

Therefore, four Related Projects (Nos. 6, 7, 8, 9) have the potential for overlapping construction with the Project and contributing to cumulative air quality impacts. The impact of cumulative development on short-term construction and long-term operations noise is discussed below.

As illustrated in **Table 5.13-10**, the cumulative noise impacts at the analyzed sensitive receptors would be considered significant, as they would exceed 5.0 dBA  $L_{eq}$  at three of the five analyzed sensitive receptor (note that the sixth sensitive receptor at 1251 Sunset Boulevard is a Related

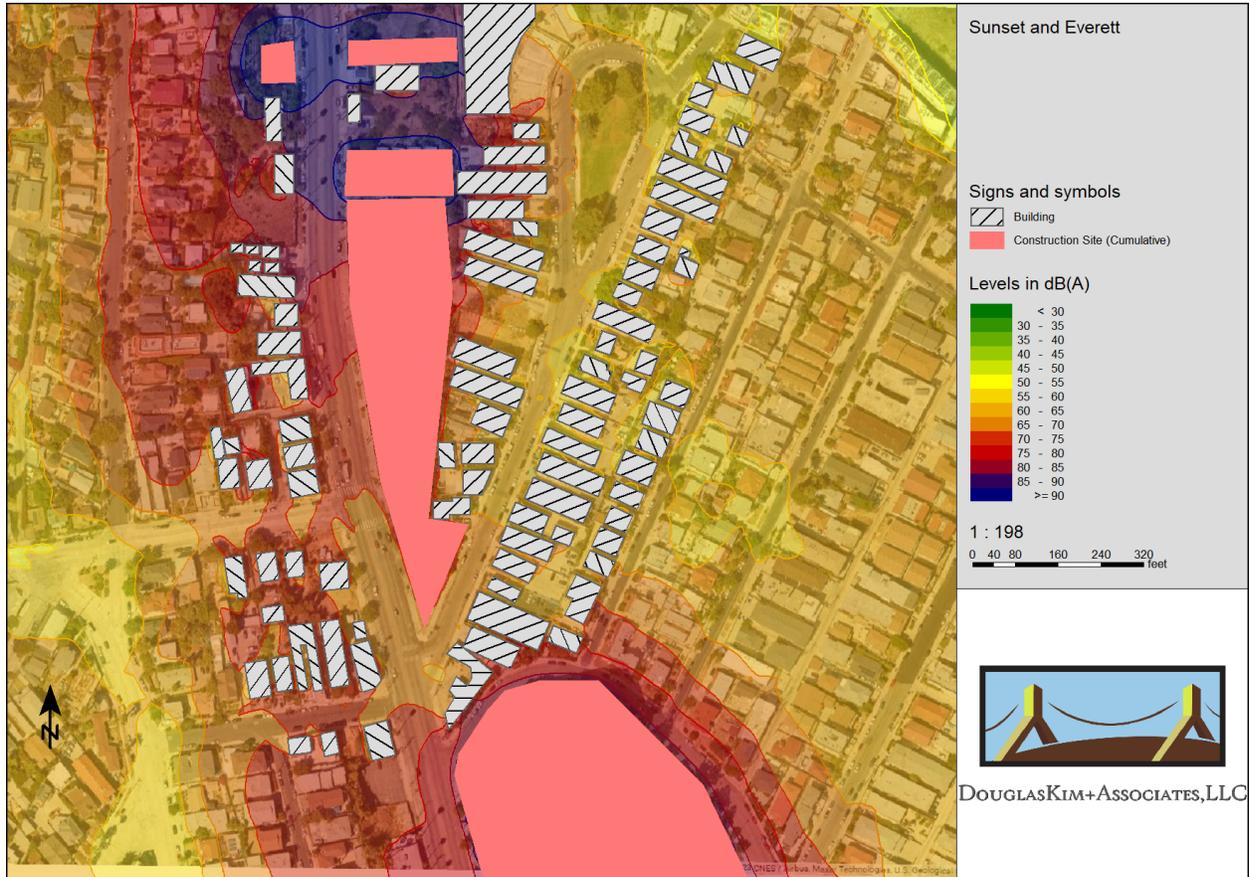
<sup>184</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

Project construction site that would remove the existing receptor). The noise contours from these Related Project(s) are illustrated in **Figure 5.13-3**. These cumulative noise levels at analyzed sensitive receptors are marginally higher than impacts from the Project alone, as more distant Related Projects have minimal impact on construction noise levels due to intervening structures that shield noise from more distant construction sites. Based on this, there would be a significant but mitigable cumulative noise impacts at any nearby sensitive uses located near the Project Site and Related Projects in the event of concurrent construction activities.

**Table 5.13-10  
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors**

<b>Receptor</b>	<b>Maximum Construction Noise Level (dBA L<sub>eq</sub>)</b>	<b>Existing Ambient Noise Level (dBA L<sub>eq</sub>)</b>	<b>New Ambient Noise Level (dBA L<sub>eq</sub>)</b>	<b>Increase (dBA L<sub>eq</sub>)</b>	<b>Potentially Significant ?</b>
1. Residences, 1271 Sunset Bl.	65.8	71.4	72.5	1.1	No
2. Residences, Sunset Bl (west side)	80.4	74.7	81.4	6.7	Yes
3. Residences, Everett St. (west side)	58.9	62.7	64.2	1.5	No
4. Residences, 1190 Sunset Bl.	79.0	72.5	79.9	7.4	Yes
5. Residences, Everett St. (east side)	78.5	62.7	78.6	15.9	Yes
Source: DKA Planning, 2023.					

**Figure 5.13-3  
Construction Noise Contours from Cumulative Development**



However, with implementation of **Mitigation Measures MM-NOI-1** through **MM-NOI-3** for the proposed Project, cumulative noise impacts at the sensitive receptors analyzed in this report would drop substantially. As illustrated in **Table 5.13-11**, cumulative impacts would be lower than 5.0 dBA  $L_{eq}$  threshold of significance at all receptors. As a result, the Project’s impact on cumulative construction noise levels is not considered significant.

**Table 5.13-11  
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors (With Mitigation)**

Receptor	Maximum Construction Noise Level (dBA $L_{eq}$ )	Existing Ambient Noise Level (dBA $L_{eq}$ )	New Ambient Noise Level (dBA $L_{eq}$ )	Increase (dBA $L_{eq}$ )	Potentially Significant ?
1. Residences, 1271 Sunset Bl.	64.7	71.4	72.2	0.8	No
2. Residences, Sunset Bl (west side)	74.2	74.7	77.5	2.8	No
3. Residences, Everett St. (west side)	54.1	62.7	63.3	0.6	No
4. Residences, 1190 Sunset Bl.	71.5	72.5	75.0	2.5	No
5. Residences, Everett St. (east side)	65.6	62.7	67.4	4.7	No

Source: DKA Planning, 2023.

## Off-Site Construction

Other concurrent construction activities from Related Projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any Related Project(s) were to utilize the same roadways. Distributing trips to and from each Related Project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Project would contribute about 431 peak hourly PCE vehicle trips during the grading phase.<sup>185</sup> This would represent about 15.1 percent of traffic volumes on Sunset Boulevard, which carries about 2,857 north- and southbound vehicles at Everett Street in the A.M. peak hour.<sup>186</sup> Any Related Projects would have to add 2,426 peak hour vehicle trips to double volumes on Sunset Boulevard.<sup>187</sup>

The four Related Projects within 1,000 feet of the Project Site would not be capable of generating this much truck traffic:

- No. 6. 1274 Sunset Boulevard. This eight-room hotel with 1,470 square feet of restaurant space would be much smaller in scale than the Project and would likely not add more than 100 peak hour PCEs to Sunset Boulevard.
- No. 7. 1275 Sunset Boulevard. This 77-unit apartment development would be smaller in scale than the Project and would likely not add more than 200 peak hour PCEs to Sunset Boulevard.
- No. 8. 1111 Sunset Boulevard. This mixed-use development with 737 apartment units; 180 hotel rooms; 48,000 square feet of office and 95,000 square feet of commercial development would be larger in scale than the Project. As such, it may add more than 900 peak hour PCEs to Sunset Boulevard.
- No. 9. 1251 Sunset Boulevard. This 70-unit apartment development would be smaller in scale than the Project and would likely not add more than 200 peak hour PCEs to Sunset Boulevard.

These four Related Projects would likely generate fewer than 1,500 PCEs during any peak hour of traffic, far fewer than the number needed to significantly elevate traffic noise by 5 dBA. As such, cumulative noise due to construction truck traffic from the Project and Related Projects do not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for traffic impacts. As such, cumulative noise impacts from off-site construction would be less than significant.

## Operation Noise

The Project Site and Victor Heights neighborhood has been developed with residential and commercial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems),

<sup>185</sup> This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

<sup>186</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

<sup>187</sup> 2,857 volume existing - 431 PCE construction from Project = 2,426 net.

outdoor activity areas, and vehicle travel. The four Related Projects in the vicinity of the Project Site are residential or mixed-use in nature and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. These types of uses generally do not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

### On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from Related Projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Project. The presence of intervening multi-story buildings along Sunset Boulevard and the residential neighborhoods that flank it will generally shield noise impacts from one or more projects that may generate operational noise.

Due to provisions set forth in the LAMC that limit stationary source noise from items, such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each Related Project. In addition, as discussed above, noise impacts associated with operations within the Project Site would be less than significant. Therefore, based on the distance of the Related Projects from the Project Site and the operational noise levels associated with the Project, cumulative stationary source noise impacts associated with operation of the Project and Related Projects would be less than significant.

Therefore, cumulative stationary source noise impacts associated with operation of the Project and Related Projects would be less than significant.

### Off-Site Mobile Noise Sources

The Project would add up to 1,850 vehicle trips to the local roadway network on a peak weekday at the start of operations in 2027, including up to 152 vehicle trips in the A.M. peak hour. Related Projects would have to generate 2,488 vehicle trips onto Sunset Boulevard in the peak A.M. hour to elevate noise by 3 dBA. Instead, the four nearby Related Projects would generate about 611 A.M. peak hour trips as shown in **Table 5.13-12**.

**Table 513-12**  
**Related Project Trip Generation**

Related Project	Address	A.M. Peak Hour	P.M. Peak Hour
6	1274 Sunset Bl. <sup>1</sup>	24	29
7	1275 Sunset Bl. <sup>1</sup>	27	30
8	1111 Sunset Bl. <sup>1</sup>	531	668
9	1251 Sunset Bl. <sup>2</sup>	29	34
<b>Total</b>		<b>611</b>	<b>761</b>

<sup>1</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>2</sup> 1251 Sunset Boulevard Technical Memorandum, Jano Baghdanian & Associates, August 2018.

When combined with the Project, these five developments would add 763 A.M. peak hour trips, a 26.7 percent increase in volume to traffic on Sunset Boulevard at Everett Street in the A.M. peak hour, assuming all vehicle trips use this roadway segment. As this would not increase traffic

volumes by 100 percent, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA, let alone by the 5 dBA threshold of significance. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective “Normally Unacceptable” or “Clearly Unacceptable” noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

### **Construction Vibration**

During construction of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). As noted earlier, the Project’s potential to damage nearby buildings is less than significant. However, nearby structures could be subject to cumulative vibration impacts if concurrent construction and vibration activities were to occur within close proximity. Any such, Related Projects would need to limit or avoid use of pile drivers or other impacting equipment for any shoring of structures.

As illustrated in **Table 5.21-1**, all Related Projects are over 150 feet away from the Project Site with no possibility of cumulative impacts on any of the same sensitive receptors, except for No. 9 (1251 Sunset), which is 5 feet north of the Site. This location was also considered a sensitive receptor since it contains existing residential buildings that are vacant but could be re-occupied. As shown in Table 5.13-9 above, this location would not be subject to vibration impacts that exceed the threshold for building damage. As noted above, vibration impacts are limited to within 15 feet of the source of vibration. With the necessary distance for equipment maneuverability, the sources of vibration would be 15 feet from any sensitive receptor. As such, there are no identified or reasonably foreseeable Related Projects that could generate cumulative vibration impacts when the Project begins construction in late 2024. As such, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA’s vibration damage criteria.

### **Off-Site Construction Vibration**

While haul trucks from any Related Projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The FTA finds that “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are buildings near the right- of-way of the anticipated haul route for the Project (e.g., Sunset Boulevard, Beaudry Avenue). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from any Related Projects that would contribute truck trips to Sunset Boulevard, Beaudry Avenue, and other streets along the Project’s

haul route are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other Related Projects along the anticipated haul route(s) would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

Due to the rapid attenuation characteristics of groundborne vibration and the proximity of major development proposed in the Victor Heights and Angelino Heights neighborhoods, there is no potential for a cumulative construction vibration impact with respect to building damage associated with groundborne vibration from on-site sources. In addition, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant. Therefore, on-site and off-site construction activities associated with the Project and one or more potential Related Projects would not generate excessive groundborne vibration levels with respect to building damage.

### **Operation Vibration**

The Project Site and surrounding Sunset Boulevard corridor have been developed with commercial, residential, and other uses that will continue to generate minimal groundborne vibration. Similar to the Project, any Related Projects in the vicinity of the Project Site could generate vibration from ongoing day-to-day operations. However, given the commercial and residential zoning along Sunset Boulevard, and adjacent residential neighborhoods, any Related Projects would not be typically associated with excessive groundborne vibration from on-site sources. However, each project would produce traffic volumes that are capable of generating roadway vibration impacts.

### **On-Site Operation Vibration**

During operation of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). In general, Related Projects in this corridor would be commercial retail, hotel, or residential land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

### **Off-Site Operation Vibration**

Like the Project, any concurrent development near the Project Site would contribute normal passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result in significant, cumulative increases in groundborne vibration on Sunset Boulevard or other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

Due to the rapid attenuation characteristics of groundborne vibration and the proximity of major development proposed in this part of the Hollywood community, there is no potential for a cumulative operations vibration impact with respect to building damage associated with

groundborne vibration from on-site sources. In addition, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant. Therefore, on-site and off-site operations activities associated with the Project and one or more potential Related Projects would not generate excessive groundborne vibration levels with respect to building damage.

## 1.14 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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"/>

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM POP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people.
- b) Prioritize the use existing ROWs, wherever feasible.
- c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.
- d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable).

- e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.

### ***Applicability to the Project***

As discussed below, the Project would not displace any existing housing units. Therefore, **PMM POP-1** is not applicable to the Project.

### **Impact Analysis**

- a) **Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**Less Than Significant Impact.** The Project proposes the development of a mixed-use project comprised of two buildings with 327 residential units that include 41 Very Low Income affordable units and approximately 9,462 square feet of ground-floor commercial space for a total floor area of 321,300 square feet. The construction of new residential units would increase the residential population within the Project Site and vicinity.

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG's 2020–2045 RTP/SCS, which was approved by SCAG's Regional Council on September 3, 2020, provides population, housing, and employment projections for cities under its jurisdiction through 2045. The growth projections in the 2020–2045 RTP/SCS reflects the 2017 American Community Survey, employment data from the California Employment Development Department, population, and household data from the California Department of Finance, and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion.

According to SCAG's 2020–2045 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2023 is approximately 4,135,955 persons.<sup>188</sup> As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,251,472 persons in 2027, the projected occupancy year of the Project.<sup>189</sup> Therefore, the projected population growth between 2023 and 2027 is approximately 115,517 persons.

188 Based on a linear interpolation of SCAG's 2016–2045 data, the 2023 values for population, housing, and employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2023.  $4,771,300 \text{ persons (2045)} - 3,933,800 \text{ persons (2016)} = 837,500 \text{ persons over 29 years} = 28,879 \text{ persons/year}$ .  $2027 \text{ (buildout)} - 2023 \text{ (existing)} = 4 \text{ years} \times 28,879 = 115,517 \text{ persons over 4 years}$ . [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 October 13, 2023.

189 Based on a linear interpolation of SCAG's 2016–2045 data, the 2027 values for population, housing, and employment are calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2027.

Based on the City’s VMT Calculator Documentation, the Project could generate a new residential population of approximately 773 residents.<sup>190</sup> The estimated 773 new residents generated by the Project would represent approximately 0.67 percent of the population growth forecasted by SCAG’s 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2027.<sup>191</sup>

The Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth in the area. Therefore, the Project’s residents would be well within SCAG’s 2020–2045 population projection for the City of Los Angeles Subregion.

According to the 2020–2045 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2023 is approximately 1,469,828 households.<sup>192,193</sup> As projected by the 2020–2045 RTP/SCS, the City of Los Angeles Subregion is anticipated to have approximately 1,528,586 households in 2027, the projected occupancy year of the Project.<sup>194</sup> Therefore, the projected household growth in the City between 2023 and 2027 is approximately 58,759 households.

The Project’s 327 residential households added by the Project would constitute approximately 0.56 percent of the housing growth forecasted between 2023 and 2027 by SCAG’s 2020–2045 RTP/SCS.<sup>195</sup>

The Project would also assist the City in meeting its fair share of regional housing need, provide new housing opportunities, and conform to City and regional policies supporting higher density, compact, infill housing development in an area well-served by transit. Therefore, the Project’s households would be well within SCAG’s 2020–2045 household projection for the City of Los Angeles Subregion.

In addition to the residential population, operation of the Project would generate new employment positions, which could result in increased population growth in the area. The Project’s 9,462 square feet of ground-floor commercial space would generate approximately 38 new employees based on employee generation rates developed by the LADOT.<sup>196</sup>

190 City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1. City of Los Angeles VMT Calculator Documentation, v1.3. LADOT population and employee numbers are shown on Table 1: [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). As shown, multi-family residential is 2.25 persons per unit and affordable family is 3.14 persons per unit.

191  $773 \text{ persons} / 115,517 \text{ persons} \times 100\% = 0.67\%$

192 Based on a linear interpolation of SCAG’s 2016–2045 data, the 2023 values for population, housing, and employment are calculated using SCAG’s 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2023.  $1,793,000 \text{ households (2045)} - 1,367,000 \text{ households (2016)} = 426,000 \text{ over } 29 \text{ years} = 14,689.6 \text{ households/year}$ .  $2027 \text{ (buildout)} - 2023 \text{ (existing)} = 4 \text{ years} \times 14,689.6 = 58,759 \text{ households over } 4 \text{ years}$ . [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 October 13, 2023.

193 SCAG forecasts “households,” not housing units. As defined by the U.S. Census Bureau, “households” are equivalent to occupied housing units.

194 Based on a linear interpolation of SCAG’s 2016–2045 data, the 2027 values for population, housing, and employment are calculated using SCAG’s 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2027.

195  $327 \text{ units} / 58,759 \text{ units} \times 100\% = 0.56\%$

196 Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 4 employees per 1,000 square feet of High-Turnover Sit-Down Restaurant.

According to the 2020–2045 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2023 is approximately 1,917,721 employees.<sup>197</sup> In 2027, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,957,390 employees in 2027, the projected occupancy year of the Project.<sup>198</sup> Therefore, the projected employment growth in the City between 2023 and 2027 based on SCAG’s 2020–2045 RTP/SCS is approximately 39,669 employees.

Thus, the Project’s estimated 38 new employees would constitute approximately 0.1 percent of the employment growth forecasted between 2023 and 2027.<sup>199</sup> The provision of new jobs would constitute a small percentage of employment growth. It would not be considered “unplanned growth” and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth. Therefore, the Project would not cause an exceedance of SCAG’s employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG’s population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth, and impacts would be less than significant.

**b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The Project Site is vacant. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, no impacts related to displacement of people or housing would occur.

### Cumulative Impacts

**Less Than Significant Impact.** There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).<sup>200</sup> The cumulative analysis takes into consideration the nine Related Projects. However, the Related Projects would not result in an exceedance of SCAG’s projection populations, as they would include a relatively small amount of housing units. The Related Projects include 1,055 units which

<sup>197</sup> Based on a linear interpolation of SCAG’s 2016–2045 data, the 2023 values for population, housing, and employment are calculated using SCAG’s 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2023.

<sup>198</sup> Based on a linear interpolation of SCAG’s 2016–2045 data, the 2027 values for population, housing, and employment are calculated using SCAG’s 2016 and 2045 values to find the average increase between years and then applying that annual increase to each year until 2027.  $2,135,900 \text{ employment (2045)} - 1,848,300 \text{ employment (2016)} = 287,600 \text{ over 29 years} = 9,917.2 \text{ employment/year}$ .  $2027 \text{ (buildout)} - 2023 \text{ (existing)} = 4 \text{ years} \times 9,917.2 = 39,669 \text{ employment over 4 years}$ . [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 October 13, 2023.

<sup>199</sup>  $38 \text{ employees} / 39,669 \text{ employment} \times 100\% = 0.1\%$

<sup>200</sup> City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

could generate approximately 2,374 residents.<sup>201</sup> This is a conservative assumption that includes the completed Related Projects Nos. 1 and 4.

The estimated 2,374 new residents generated by the Related Projects would represent approximately 2.05 percent of the population growth forecasted by SCAG's 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2027.<sup>202</sup>

The Related Projects' 1,055 residential households would constitute approximately 1.79 percent of the housing growth forecasted between 2023 and 2027 by SCAG's 2020–2045 RTP/SCS.<sup>203</sup>

Furthermore, as discussed above, the Project would not induce population growth beyond that included in the SCAG 2045 population projections contained in the 2020–2045 RTP/SCS. As such, the Project would not directly or indirectly contribute to significant cumulative impacts associated with population and housing, and cumulative impacts would be less than significant.

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<sup>201</sup> City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1. City of Los Angeles VMT Calculator Documentation, v1.3. LADOT population and employee numbers are shown on Table 1: [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). As shown, multi-family residential is 2.25 persons per unit and affordable family is 3.14 persons per unit.

<sup>202</sup>  $2,374 \text{ persons} / 115,517 \text{ persons} \times 100\% = 2.05\%$

<sup>203</sup>  $1,055 \text{ units} / 58,759 \text{ units} \times 100\% = 1.79\%$

## 1.15 Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<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"/>

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

**J-1** Police Response, Los Angeles Police Department, December 7, 2023

**J-2** School Response, Los Angeles Unified School District, January 11, 2024

**J-3** Park Response, Los Angeles Department of Recreation and Parks, October 30, 2023

**J-4** Library Response, Los Angeles Public Library, October 12, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM PSP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated in to the project description.
- b) 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.

- c) Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.

### ***Applicability to the Project***

As analyzed below, existing facilities are capable of providing acceptable fire and emergency response services for the Project. Furthermore, the Project would be subject to existing regulations included in the City's Fire Code and LAMC related to emergency access. In addition, consistent with **PMM PSP-1(c)**, the Project would include **Project Design Feature PDF-TRAN-1**, which requires the preparation and implementation of a Construction Traffic Management Plan, which would ensure that adequate and safe access remains available within and near the Project Site during construction activities. Adherence to applicable regulatory measures and incorporation of **Project Design Feature PDF-TRAN-1** would be equal to or more effective than **PMM PSP-1**, and thus, it would not be applicable to the Project.

**PMM PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.

### ***Applicability to the Project***

Consistent with **PMM PSS-1** and as discussed below, the Project Applicant shall pay required school fees to the Los Angeles Unified School District pursuant to SB 50. As the existing regulatory requirement regarding the payment of school fees would be equal to or more effective than **PMM PSS-1**, this measure is not applicable to the Project.

**PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- 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.

### ***Applicability to the Project***

Library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the Project, which would be to be used to offset the Project's potential incremental increased demand for library facilities and services. As the existing regulatory requirement regarding the payment of property taxes would be equal to or more effective than **PMM PSL-1**, this measure is not applicable to the Project.

### **Impact Analysis**

#### **a) Fire Protection?**

**Less Than Significant Impact.** The analysis below relies on the following metrics from the LAFD to assess potential demands on fire protection and emergency medical services: the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels; response distances, emergency access, and response times; and fire flow requirements. The analysis is based on information available on the LAFD website.

LAFD provides fire protection and emergency medical services for the Project Site. The Project Site is located within LAFD's Central Bureau, which encompasses Downtown Los Angeles and surrounding communities.<sup>204</sup> The designated "first-in" station is Fire Station No. 3, located at 108 N. Fremont Avenue, approximately 0.8 miles south of the Project Site.<sup>205</sup> In addition, Fire Station No. 20 is located at 2144 Sunset Boulevard, approximately 1.2 miles northwest of the Project Site.

LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

According to LAMC Section 57.512.1,<sup>206</sup> response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3 (recreated below).<sup>207</sup>

This Project would be a high density development. For a high density residential land use, the maximum response distance is 1.5 mile for an engine company and 2 miles for a truck company. The maximum response distances for both fire suppression companies (engine and truck) must

<sup>204</sup> LAFD Central Bureau: <https://www.lafd.org/about/central-bureau>, accessed October 5, 2023.

<sup>205</sup> City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

<sup>206</sup> LAMC Section 57,512.1,  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512).

<sup>207</sup> LAMC Table 57,507.3.3,  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.507.3.3](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.507.3.3)

be satisfied. According to LAMC Section 57.512.2<sup>208</sup>, where a response distance is greater than that shown in Table 57.507.3.3 (table recreated below), all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

**Table 57.507.3.3  
Response Distances That If Exceeded Require The Installation Of An Automatic Fire  
Sprinklers System**

* Land Use	Required Fire-Flow	Maximum Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
High Density Residential and Commercial Neighborhood	4,000 gpm from four adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four hydrants flowing simultaneously	1 mile	1-1/2 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required)	3/4 mile	1 mile
gpm – gallons per minute Land use designations are contained in the community plan elements of the General Plan for the City of Los Angeles. The maximum response distances for both L.A.F.D. fire suppression companies (engine and truck) must be satisfied. LAMC Table 57.507.3.3.			

As shown in **Table 5.15-1**, Fire Station No. 3 has an task light force (composed of a truck company and two engine companies).<sup>209</sup> Therefore, the Project Site is located within the distance identified by LAMC Section 57.512.1<sup>210</sup> (i.e. within 1.5 mile for an engine and 2 miles for a truck).

Since the Project Site is located within the distance identified by LAMC Section 57.507.3.3, it does not need automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

<sup>208</sup> LAMC Section 57,512.2,  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512.2](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512.2).

<sup>209</sup> LAFD: <http://www.lafd.org/about/about-lafd/apparatus>.

<sup>210</sup> LAMC Section 57,512.1,  
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512).

The Project Site is in an urbanized area completely surrounded by development. The Project Site is not located in a Very High Fire Hazard Severity Zone<sup>211</sup> or in the wildlands fire hazard Mountain Fire District.<sup>212</sup>

The Project Site is not within Fire District 1.<sup>213</sup> These are areas identified by the City that are required to meet additional developmental regulations to mitigate fire hazard related risks. There are nine areas located in Downtown, Hollywood, Wilshire, Beverly-Fairfax, Crenshaw, Century City, Westwood, Van Nuys, Venice, and San Pedro areas of the City. Fire District 1 limits the type of construction as defined in the California Building Code (CBC) to Types I, II and III, prohibits Types IV and V construction, and provides for additional fire life safety requirements. Fire District 1 is a building code provision found in Chapter 9, Article 1, Division 72 of the LAMC (Section 91.7201.1).<sup>214</sup>

**Table 5.15-1  
Fire Stations**

No.	Address	Distance	Equipment	Operational Response Time	Incident Counts
3	108 N. Fremont Avenue	0.8 mile	Task Force Paramedic Ambulance Rescue Ambulance Search and Rescue EMS Battalion Captain Battalion Chief	EMS: 7:13 min Non-EMS: 6:30 min	EMS: 3,799 Non-EMS: 1,283
20	2144 Sunset Boulevard	1.2 miles	Light Force Assessment Engine Paramedic Ambulance Rescue Ambulance Decon Tender	EMS: 7:12 min Non-EMS: 6:36 min	EMS: 2,303 Non-EMS: 584
<p>Response Time: (January to August 2023) average time (turnout time + travel time) in the station area. Incident counts: (January to August 2023). Non-EMS is fire emergency. EMS is emergency medical service. <a href="http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf">http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf</a> Light Force: Truck company and single engine. Task Force: Truck company and two fire engines. LAFD November 2022 Fire Station Directory. Table: CAJA Environmental Services, October 2023.</p>					

## Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in

<sup>211</sup> ZIMAS search: <http://zimas.lacity.org/>.

<sup>212</sup> Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: [https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety\\_Element.pdf](https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf), accessed October 5, 2023.

<sup>213</sup> <http://zimas.lacity.org/>, accessed October 5, 2023.

<sup>214</sup> LADBS, Report Relative to Expanding Fire District 1, May 27, 2021: [https://clkrep.lacity.org/onlinedocs/2019/19-0603\\_rpt\\_dbs\\_%205-27-21.pdf](https://clkrep.lacity.org/onlinedocs/2019/19-0603_rpt_dbs_%205-27-21.pdf)

combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.<sup>215</sup> Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.<sup>216</sup> Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, as discussed under Checklist Section 17, Transportation, construction activities would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Therefore, although construction activities would be short-term and temporary for the area, those activities could temporarily impact emergency access.

A Construction Traffic Management Plan would be implemented during Project construction pursuant to **Project Design Feature PDF-TRAN-1** to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The plans would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits and would provide a detour plan and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction would require a temporary traffic constraints. To accommodate Project construction, closure of the northbound parking/PM peak hour bus lane on Sunset Boulevard along the Project frontage is anticipated between 6:30 AM and 4:00 PM, so as not to interfere with PM peak hour buses or the Dodger Stadium Express bus route during home games. During construction of the Project, a pedestrian canopy will be constructed to maintain

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215 United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, <https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.150>, accessed October 5, 2023.

216 United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, <https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.150>, accessed October 5, 2023.

access to the sidewalk, bus stop, and crosswalks at Marion Avenue.<sup>217</sup> This is included as part of the Construction Traffic Management Plan identified in **Project Design Feature PDF-TRAN-1**.

Thus, based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

## Operation

### Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 3, the “first-in” station for the Project Site, located approximately 0.8 mile south of the Project Site. As such, as described below, Fire Station No. 3 falls within the required 1.0-mile engine company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency.

As discussed under Checklist Section 14, Population and Housing, implementation of the Project would result in 773 new residents and 38 new employees<sup>218</sup>, which would result in an increase in the on-site service population within the service area of Fire Station No. 3.

While the Project’s residential and employee population would increase the demand for LAFD fire protection and emergency medical services, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communication systems etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118 and which are required prior to the issuance of a building permit. The Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

Compliance with applicable regulatory requirements, including LAFD’s fire/life safety inspection for the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new facilities. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, as confirmed in the written correspondence from the LAFD, the City and LAFD would continue to monitor the demand for existing and projected fire facilities and coordinate the development of new fire

<sup>217</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

<sup>218</sup> City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1. City of Los Angeles VMT Calculator Documentation, v1.3. LADOT population and employee numbers are shown on Table 1: [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). As shown, multi-family residential is 2.25 persons per unit and affordable family is 3.14 persons per unit.

facilities to be phased with growth. As such, Project impacts with regard to LAFD facilities and equipment would be less than significant.

### **Response Distance, Emergency Access, and Response Times**

As described in Section 3, Project Description, of this SCEA, vehicular access to the Project Site, including emergency vehicle access, would be provided via three access driveways along Sunset Boulevard (northern end of Site, middle of Site, Sunset Boulevard/Marion Avenue). The addition of Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties.

However, the area surrounding the Project Site includes an established street system and, as discussed in the Transportation Assessment included as **Appendix K-1** of this SCEA, the addition of Project traffic to study intersections would not cause or substantially contribute to unacceptable queuing during any peak hours per the City's criteria.<sup>219</sup> LADOT reviewed the Transportation Assessment and issued an approval confirming that the Project would not have a significant transportation impact, included as **Appendix K-2** of this SCEA.<sup>220</sup>

In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site. Furthermore, the Project would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or diving in the lanes of opposing traffic, pursuant to California Vehicle Code (CVC) Section 21806.

Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and/or surrounding area. Furthermore, compliance with applicable City Building Code and Fire Code requirements regarding site access would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. Therefore, emergency access to the Project Site and surrounding area would be provided and/or maintained, and Project impacts with regard to emergency access would be less than significant.

### **Fire Flow**

Fire flow to the Project would be required to meet City fire flow requirements. The City of Los Angeles Fire Code (LAMC Section 57.507.3.1) establishes fire flow standards by development type. Based on the land use shown in LAMC Table 57.507.3.3, the required fire flow for the Project Site is expected to be 4,000 gallons per minute (gpm) from four fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi), which corresponds to the High Density Residential and Commercial Neighborhood Category.

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<sup>219</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>220</sup> Approval Letter, Los Angeles Department of Transportation, December 7, 2023.

The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development. Final fire flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project by LAFD during the plan check process. If the Project is determined to require one or more new hydrants during plan check in accordance with city standards, the Project would have to provide them.

The following fire hydrants are near the Project Site:<sup>221</sup>

- Hydrant (ID 10210, size 2½D, 12-inch main) on northwest corner of Marion Avenue and Sunset Boulevard, 75 feet west of the Site.
- Hydrant (ID 10211, size 2½D, 12-inch main) on west side of Sunset Boulevard, midblock between Marion Avenue and Innes Avenue, 75 feet west of the Site.
- Hydrant (ID 10208, size 2½D, 12-inch main) on west side of Sunset Boulevard, south of Boylston Street, 240 feet southwest of the Site.
- Hydrant (ID 10209, size 2½ x 4D, 8-inch main) on Sunset Boulevard, north of White Knoll Drive, 200 feet south of the Site.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city would comply with that provision to ensure that public safety services are provided.<sup>222</sup>

Based on the analysis above, Project construction and operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit emergency response. Therefore, construction and operation of the Project would not result in substantial adverse impacts associated with the provision of a new physically altered governmental facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services, and impacts would be less than significant.

<sup>221</sup> Navigate LA, DWP (Fire Hydrants) Layer: <http://navigatela.lacity.org/navigatela/>, accessed October 5, 2023

<sup>222</sup> *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

## Cumulative Impacts

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis for fire protection is the service area of Fire Stations No. 3 and No. 20. The increase in development and residential service populations from the Project, Related Projects, and other future development in the service areas of the above-mentioned fire stations would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the Related Projects and other future development projects in the area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each Related Project and other future development projects would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, Related Projects, and other future development projects would be subject to the City’s standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As with the Project, the Related Projects and other future development projects in the vicinity would also generate revenues to the City’s General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.<sup>223</sup> Cumulative increases in demand for fire protection services due to Related Projects and other future development projects would be identified and addressed through the City’s annual programming and budgeting processes. LAFD resource needs would be identified, and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station, would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

Thus, compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant and the Project’s contribution to cumulative impacts would not be cumulatively considerable.

### b) Police Protection?

#### **Less Than Significant Impact.**

The Project Site is located within the Central Bureau of the Los Angeles Police Department (LAPD), which covers a territory of approximately 65 square miles with a population of approximately 842,700 residents.<sup>224</sup> The Central Bureau oversees operations in Central, Rampart, Hollenbeck, Northeast, Newton service areas as well as the Central Traffic Division. The Project is served by the Central Community Police Station is located at 251 E. 6th Street,

<sup>223</sup> City of Los Angeles, Proposed Budget for the Fiscal Year 2022–2023.

<sup>224</sup> LAPD, Central Bureau, <https://www.lapdonline.org/lapd-contact/central-bureau/>, accessed October 5, 2023.

approximately 2.3 miles south of the Project Site.<sup>225</sup> The Central Community Police Station covers approximately 4.5 square miles and serves approximately 40,000 residents, has approximately 345 sworn officers.<sup>226</sup> The resident-to-officer ratio is 115:1.

## Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to **Project Design Feature PDF-POL-1**, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of this security measure, potential impacts associated with theft and vandalism during construction activities would be reduced.

Project-related construction vehicles would have the potential to increase emergency vehicle response times due to travel time delays caused by construction traffic. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic.

However, as discussed under Checklist Section 17, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented during Project construction pursuant to **Project Design Feature PDF-TRAN-1**, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the LADOT and may include narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as emergency vehicles have the ability to avoid traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Thus, impacts on police protection services during Project construction would be less than significant.

## Operation

The Project would introduce a new residential population to the Central area.<sup>227</sup> As previously discussed, the Project Site is under the jurisdiction of the LAPD's Central Community Police

<sup>225</sup> <http://zimas.lacity.org>, accessed October 5, 2023.

<sup>226</sup> LAPD, Central Community Police Station, <https://www.lapdonline.org/lapd-contact/central-bureau/central-community-police-station/>, accessed October 5, 2023. Also [Police Response](#), Los Angeles Police Department, December 7, 2023.

<sup>227</sup> The LAPD considers the residential population within their service area to evaluate service capacity. However, in addition to the Project's residential population, this analysis also considers the Project's daytime employee population to provide a conservative analysis of Project-level impacts.

Station, which is staffed by approximately 345 sworn officers and has a service population of approximately 40,000 residents. As discussed under Checklist Section 14, Population and Housing, implementation of the Project would result in 811 new persons (consisting of 773 new residents and 38 new employees<sup>228</sup>), which would result in an increase in the on-site service population within the service area of LAPD.

This would increase the existing LAPD service population in the Central Area from approximately 40,000 persons to approximately 40,811 persons, an increase of 2%. With the increase in the police service population, the officer-to-resident ratio for the Central Area would be reduced from approximately one officer for every 115 residents<sup>229</sup> to approximately one officer for every 102 persons.<sup>230</sup> This ratio would continue to be lower than the Citywide ratio of one officer for every 433 residents. However, the Project would not cause a substantial change in the officer-to-resident ratio for the Central Community Police Station.

As outlined below, **Project Design Features PDF-POL-2** through **PDF-POL-6** would include numerous operational design features to enhance safety within and immediately surrounding the Project Site.

Specifically, as set forth in **Project Design Feature PDF-POL-2**, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas.

In addition, pursuant to **Project Design Features PDF-POL-3** and **PDF-POL-4**, the Project would include proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

The Project would also design entrances to, and exits from, the building and open spaces areas, to be open and in view of surrounding sites, as provided in **Project Design Feature PDF-POL-5**.

Furthermore, as specified in **Project Design Feature PDF-POL-6**, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response.

The Project's design features, would help offset the Project-related increase in demand for police services. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

228 City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1. City of Los Angeles VMT Calculator Documentation, v1.3. LADOT population and employee numbers are shown on Table 1: [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). As shown, multi-family residential is 2.25 persons per unit and affordable family is 3.14 persons per unit.

229 40,000 residents ÷ 345 officers = 1 officer for every 115 residents.

230 40,811 total Project daytime population ÷ 400 officers = 1 officer for every 102 residents.

The Project would introduce new uses to the Project Site that would generate additional traffic in the Project Site vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by voters in 1993 pursuant to Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city would comply with Proposition 172 to ensure that public safety services are provided.<sup>231</sup>

Thus, based on the above analysis, the Project would not generate a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project will not result in the need for new or altered police facilities.

### **Project Design Features**

The Project would implement the following Project Design Features:

- PDF-POL-1:** During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.
- PDF-POL-2:** The Project will include a closed-circuit camera system and secure entry for the residential uses and resident parking areas.

<sup>231</sup> City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

- PDF-POL-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building.
- PDF-POL-4:** The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.
- PDF-POL-5:** The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.
- PDF-POL-6:** Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Overall, based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Thus, impacts with regard to police protection services and facilities would be less than significant.

### Cumulative Impacts

**Less Than Significant Impact.** The nine Related Projects fall within the boundaries of the Central Area, within the Central, Rampart, and Northeast Community Police Stations.<sup>232</sup> It is anticipated that the Project in combination with the Related Projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service.

Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

<sup>232</sup> LAPD, Bureaus and Divisions map: <https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/09/citywide.pdf>

### c) Schools?

**Less Than Significant Impact.** The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD), which is divided into six local districts. The Project is located within the East Local District.<sup>233</sup>

The Project is served by the following LAUSD schools:<sup>234</sup>

- Betty Plascencia Elementary School (grades K-5), 1321 Cortez Street, 0.3 miles west of the Site
- Sal Castro Middle School (grades 6-8), 1575 2nd Street, 0.7 miles southwest of the Site
- Belmont Zone of Choice (high school grades 9-12):<sup>235</sup>
  - Belmont Senior High, 1575 W. 2nd Street, 0.7 miles southwest of the Site
  - Royal Learning Center, 1200 W. Colton Street, 0.5 miles southwest of the Site
  - Contreras Learning Center, 322 Lucas Avenue, 0.7 miles southwest of the Site
    - Academic Leadership Community
    - Business and Tourism
    - Social Justice
    - Global Studies
  - Cortines School of Visual and Performing Arts, 450 Grand Avenue, 0.6 miles south of the Site

As previously discussed, the Project would construct a new mixed-use building comprised of 327 residential and live-work units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space. The residential units directly generate students and the commercial use employees indirectly generate students through their families. As shown in **Table 5.15-2**, the Project would generate approximately 123 students.

**Table 5.15-2  
Estimated Student Generation**

Land Use	Project Amount	Student Generation			
		Elementary	Middle	High	Total
Multi-Family Dwelling Units	327 units	64	18	35	117
Commercial	9,462 sf	3	1	2	6
<b>Total</b>		<b>67</b>	<b>19</b>	<b>37</b>	<b>123</b>

<sup>233</sup> LAUSD, Local District Map: <https://www.lausd.org/domain/34>

<sup>234</sup> LAUSD School Finder: <https://explorelausd.schoolmint.net/school-finder/home> and <https://rsi.lausd.net/ResidentSchoolIdentifier/>

<sup>235</sup> Schools & programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries.

LAUSD Developer Fee Justification Study, March 2022.

Students per household: 0.1953 elementary, 0.0538 middle; 0.1071 high school.  
Students per 1,000 sf: 0.467 for neighborhood shopping centers, 0.195 for lodging.

Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 55 percent for elementary, 15 percent for middle, and 30 percent for high school.

Table: CAJA Environmental Services, October 2023.

As such, the Project would create new demand for capacity at the LAUSD schools that serve the Project Site. It should be noted, however, that this analysis does not include students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options that are not accounted for that may be available to Project-generated students include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
- Magnet schools and centers, which are open to qualified students in the LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known childcare agency, private organization, or a verifiable child care provider.

According to the LAUSD, Plasencia Elementary School has adequate capacity now and in the future (projected 5 years) to accommodate 67 additional elementary school students. Castro Middle School and Belmont High School Zone of Choice are overcrowded now and Castro Middle would remain overcrowded in the future.<sup>236</sup> However, overcrowded is not an impact for the reason discussed below.

Additionally, pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees fully addresses Project-related school impacts.

<sup>236</sup> [School Response](#), Los Angeles Unified School District, January 11, 2024.

Thus, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

Overall, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., schools), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Thus, impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** Each of the nine Related Projects are located within the boundaries of LAUSD, and six of the nine Related Projects would include a residential component (Nos. 1, 3, 4, 7, 8, 9). As discussed above, in accordance with SB 50, payment of developer impact fees would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the Related Projects would be required to pay school fees, which would fully mitigate any potential impacts to school facilities.

Therefore, cumulative impacts associated with schools would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

#### **d) Parks?**

### **Less Than Significant Impact.**

#### **Construction**

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population in the vicinity of the Project Site, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-

mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As such, there would be no impact related to construction activities, as construction workers would not demand and utilize parks services, and no facilities would be burdened such that new or expanded facilities would be required.

### Operation

Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the City of Los Angeles Department of Recreation and Parks (LADRP). Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site are listed in **Table 5.15-3**.

**Table 5.15-3  
Parks and Recreation Centers**

Name	Address	Acres	Features
<b>Neighborhood Parks (less than 10 acres and within one mile radius of the Project Site)</b>			
Alpine Recreation Center	817 Yale Street	1.94	Auditorium, basketball courts (lighted/indoor/outdoor), children's play area, indoor gym (without weights), volleyball courts (lighted).
Beverly Pocket Park	1644 Beverly Boulevard	0.32	Children's play area
Contreras Pool	322 S. Lucas Avenue	0.55	Pool
Echo Deep Pool	1419 Colton Street	2.07	Pool
Everett Park	1010 N. Everett Street	0.53	Pocket Park
Lilac Terrace Park	1253 W. Lilac Terrace	2.83	Veteran's Memorial grove
Rockwood Park	1571 W. Rockwood Street	0.91	Open Space
<b>Community Parks (greater than 10 acres and within two mile radius of the Project Site)</b>			
Echo Park	751 Echo Park Boulevard	28.41	Barbecue pits, baseball diamond (lighted), basketball courts (lighted/indoor/outdoor), children's play area, community room, indoor gym (without weights), picnic tables, seasonal pool (outdoor/unheated), soccer field (lighted), tennis courts (lighted), year round pool (indoor/heated/unheated)
MacArthur Park	2230 W. 6th Street	29.87	Auditorium, children's play area, picnic tables, lake
Gloria Molina Grand Park <sup>1</sup>	Between Music Center and City Hall	12	Open space, art and music events, interactive water splash pad
<b>Regional Park (greater than 50 acres and within two mile radius of the Project Site)</b>			
Elysian Park	929 Academy Road	544.71	Chavez Ridge Disc Golf Course, Chavez Ravine arboretum, hiking trails, horseshoe pits, jogging paths

<sup>1</sup> Grand Park is operated by the Los Angeles Grand Avenue Authority, a County and City joint venture. LADRP Facility Finder: <http://www.laparks.org/dos/reccenter/reccenter.htm> and <http://www.laparks.org/dos/parks/parks.htm> NavigateLA with Recreation and Parks Department layer: <http://navigateLA.lacity.org/navigateLA/> Table: CAJA Environmental Services, October 2023.

As previously discussed, the Project would construct a new mixed-use building comprised of 327 residential and live-work units (inclusive of 41 Very Low-Income Households) and 9,462 square feet of ground-floor commercial space. An increase in the use of existing parks and recreational facilities is directly associated with an increase in the residential population. As outlined above under Checklist Section 14, Population and Housing, development of the proposed 327 residential units would result in approximately 773 residents.

The Project would request an off-menu density bonus incentive, for a 30% reduction in open space to allow 24,540 square feet in lieu of the otherwise required 35,050 square feet.

The Project would provide common and private open space areas throughout the Project Site totaling approximately 24,540 square feet, which would exceed the requirements of the LAMC to provide a minimum of 24,535 square feet of open space. This includes indoor amenities, roof decks, courtyards, and balconies. There will be an approximately 45,000 gallon pool (20 feet x 60 feet).

Overall, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. While the Project's residents, visitors, and some of the new employees would be expected to use off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Additionally, compliance with regulatory requirements, including the payment of park fees pursuant to LAMC Section 12.33 would ensure that the Project's potential impacts on parks would not be significant.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities and would not require the provision of new or physically altered parks and recreational facilities, the construction of which could cause significant environmental impacts. As such, the Project's potential impacts on parks would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** Each of the nine Related Projects are located within the boundaries of LADRP, and six of the nine Related Projects would include a residential component (Nos. 1, 3, 4, 7, 8, 9) and would be required by the LAMC to provide open space for the proposed residential uses. As discussed above, the Project would result in a less than significant impact on parks and recreational facilities.

Therefore, overall, the cumulative impact associated with parks would be less than significant, and the Project's contributions to cumulative impacts would not be cumulatively considerable.

### e) Other Public Facilities?

**Less Than Significant Impact.** Other public facilities available include libraries. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 7.1 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.<sup>237</sup>

On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

**Table 5.15-4** describes the libraries that would serve the Project.

**Table 5.15-4  
Los Angeles Public Libraries**

Name	Address	Size (sf)	Collection Size / Circulation	Service Population	Staff
Central Library	630 5th Street	538,000	2,600,000 / 1,200,000	250,264	390
Chinatown	639 Hill Street	14,500	82,990 / 26,167	22,365	10
Echo Park	1410 Temple Street	17,543	39,348 / 28,447	26,890	8
Edendale	2011 Sunset Boulevard	12,500	47,068 / 29,493	30,973	9
Little Tokyo	203 Los Angeles Street	12,500	61,939 / 41,013	50,136	9.75
Silver Lake	2411 Glendale Blvd.	13,670	64,056 / 88,438	15,274	9
Staffing is full-time equivalent. Current service is estimated from LA Times Mapping LA database and branch library community boundaries.					
<u>Library Response</u> , Los Angeles Public Library, October 12, 2023.					

As outlined above under Checklist Section 14, Population and Housing, development of the proposed 327 residential units would result in approximately 773 residents, which could result in a direct demand for libraries. It is anticipated that a portion of the residential population generated by the Project that would visit library facilities would likely be dispersed among the various branch libraries serving the Project Site and it is not likely that all residents would visit the same library. Additionally, the Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.<sup>238,239</sup>

<sup>237</sup> LAPL website: <https://www.lapl.org/sites/default/files/media/pdf/about/LAPLFY2017-18Backgrounder10022018.pdf>

<sup>238</sup> Denise A. Troll, *How and Why Libraries are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

<sup>239</sup> Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

The Project would also develop approximately 9,462 square feet of ground-floor commercial space, which would generate approximately 38<sup>240</sup> new full-time and part-time positions; however, new positions would typically be filled by persons already residing in the vicinity of their workplace and who already generate a demand for the libraries in the vicinity of the Project Site. As such, any indirect or direct new demand for library services generated by employees of the proposed retail and restaurant uses would be negligible.

The Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that would help offset the Project-related increase in demand for library services. Therefore, with the installation of internet service capabilities throughout the Project Site and the generation of revenues to the City's General Fund that could be applied toward the provision of new library facilities and related staffing, the Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.

### Cumulative Impacts

**Less Than Significant Impact.** The residential population of a library's service area is the primary metric used by LAPL for assessing the adequacy of library services and planning for future growth (i.e., citing of new facilities). However, as noted above, the recommended building size standards are not a threshold under CEQA or LAPL and there is no requirement to build new facilities or expand when the recommended building size standards are not met and LAPL does not make new building decisions based on any one project, but rather on the overall needs of the community. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials.

Similar to the Project, the Related Projects in the area would be required to pay the required City fees. Therefore, the cumulative impact associated with libraries would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

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240 Los Angeles Department of Transportation and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the employee generation rate of 4 employees per 1,000 square feet of High-Turnover Sit-Down Restaurant and 2 employees per 1,000 square feet of "General Retail."

## 1.16 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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"/>

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM REC-1:** In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies.
- b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as:
  - i. Increasing the accessibility to natural areas for outdoor recreation
  - ii. Utilizing “green” development techniques
  - iii. Promoting water-efficient land use and development
  - iv. Encouraging multiple uses, such as the joint use of schools
  - v. Including trail systems and trail segments in General Plan recreation standards.

### ***Applicability to the Project***

Consistent with the measures outlined in **PMM REC-1**, the Project would comply with all regulatory compliance measures associated with maintaining parks and recreational facilities. The Project would also utilize sustainable development techniques and promote water efficiency, and promote infill development. Thus, while the Project would be consistent with the relevant measures of **PMM REC-1**, adherence to regulatory requirements (including the payment of park fees pursuant to LAMC Section 12.33) and implementation of elements of the Project would be equal to more effective than these measures, and no Project-specific impacts would occur. Thus, **PMM REC-1** would not be incorporated into the Project.

### **Impact Analysis**

- 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.** As discussed above under Checklist Section 15, Public Services, parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by LADRP. Nearby parks and recreational facilities within an approximately 2-mile radius of the Project Site are listed in **Table 5.15-3** (above).

As previously discussed, while the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, the Project would comply with the City's requirements in LAMC Section 12.33 through the payment of park fees. In addition, the Project would comply with applicable open-space requirements with respect to the Project's residential component.

The Project would request an on-menu density bonus incentive, for a 30% reduction in open space to allow 24,540 square feet in lieu of the otherwise required 35,050 square feet.

The Project would provide common and private open space areas throughout the Project Site totaling approximately 24,540 square feet, which would exceed the requirements of the LAMC to provide a minimum of 24,535 square feet of open space. This includes indoor amenities, roof decks, courtyards, and balconies. There will be an approximately 45,000 gallon pool (20 feet x 60 feet).

Due to the amount, variety, and availability of the proposed open space and recreational amenities provided within the Project Site, including publicly accessible open space, it is anticipated that Project residents and employees would often utilize on-site open space and common areas to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated.

In addition, pursuant to Section 12.33 of the LAMC, the Applicant would be required to comply with applicable park fee requirements with regard to the residential component of the Project, which would be used to increase recreational opportunities for project residents and improve

existing parks, both of which would reduce the Project resident's use of existing parks and recreational facilities and/or address any deterioration of those facilities. Thus, based on the above, the Project would not 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, and impacts would be less than significant.

**b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** The Project would not require the construction or expansion of recreational facilities beyond the limits of the Project Site. Although the Project may place some additional demands on park facilities as new residents are introduced into the area, the increase in demand would be met through a combination of on-site amenities and existing parks in the Project vicinity, as discussed above.

The Project's potential increased incremental demand upon recreational facilities would not in and of itself result in the construction of a new park, which might have an adverse physical effect on the environment. In addition, the recreational facilities included as part of the Project would not have a significant adverse effect of the environment, as discussed throughout this SCEA. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment and impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** The Project would not induce population growth beyond that included in the population projections for the City in SCAG's 2020–2045 RTP/SCS, and thereby would not, directly or indirectly, contribute to significant cumulative impacts to recreation. Similar to the Project, the Related Projects in the area would be required to provide open space in accordance with the LAMC. Related Projects may also be required to pay a Dwelling Unit Construction Tax, Park Fees pursuant to LAMC Section 12.33, or other similar purpose fees, as appropriate to the projects' location and proposed uses. The payment of fees would fully mitigate any potential impacts to park and recreational facilities. Therefore, the Project's contribution to cumulative impacts associated with recreation would not be cumulatively considerable, and impacts would be less than significant.

## 1.17 Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<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"/>
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"/>

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

**K-1** Transportation Assessment, Fehr & Peers, October 2023

**K-2** Approval Letter, Los Angeles Department of Transportation, December 7, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration’s publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-

motorized modes of transportation and reduce vehicle miles traveled on the region's roadways:

- include TDM mitigation requirements for new developments;
- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks;
- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;
- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
- develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
- incorporate TDM performance measures in the decision-making process for identifying transportation investments;
- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
- set aside funding for TDM initiatives.
- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.

### ***Applicability to the Project***

Consistent with **PMM TRA-1**, the Project would incorporate TDM strategies. These TDM strategies, which include reduced parking supply, unbundled parking from residential leases, promotions and marketing of transportation options, and the provision of bicycle parking, would facilitate reductions in the Project's VMT<sup>241</sup>, resulting in a less than significant impact. Thus, these Project-specific measures are more effective than **PMM TRA-1**, and **PMM TRA-1** is not applicable to the Project.

**PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial

<sup>241</sup> [Transportation Assessment](#), Fehr & Peers, October 2023.

adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements:
- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow.
  - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone.
  - Scheduling of truck trips outside of peak morning and evening commute hours.
  - Limiting of lane closures during peak hours to the extent possible.
  - Usage of haul routes minimizing truck traffic on local roadways to the extent possible.
  - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction.
  - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.
  - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures.

- Storage of construction materials only in designated areas.
- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.
- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities.
- Enhance emergency preparedness awareness among public agencies and with the public at large.

### ***Applicability to the Project***

The Project would be subject to the City’s existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements. In addition, the Project would include a Construction Traffic Management Plan, as outlined in **Project Design Feature PDF-TRAN-1**, which would ensure that adequate emergency access exists during construction. As existing regulatory requirements equal to or more effective than the **PMM TR-1**, it would not be incorporated into the Project.

### **Impact Analysis**

#### **a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

**Less Than Significant Impact.** Pursuant to the LADOT August 2022 Transportation Assessment Guidelines (TAG), projects should be analyzed to identify potential conflicts with programs, policies, plans, or ordinances that are adopted to protect the environment. Pursuant to the TAG, in general, transportation policies or standards adopted to protect the environment are those that support multimodal transportation options and a reduction in VMT.<sup>242</sup> Each of the documents listed in the TAG (Table 2.1-1) was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project’s conformance or non-conformance with each.

#### **Mobility Plan 2035**

The Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

1. **Safety First**: Design and operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode of choice.

<sup>242</sup> Los Angeles Department of Transportation, Transportation Assessment Guidelines, August 2022: [https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines\\_final\\_2020.07.27\\_0.pdf](https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf), accessed October 5, 2023.

2. **World Class Infrastructure:** A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
3. **Access for All Angelenos:** A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
4. **Collaboration, Communication, and Informed Choices:** The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future. The amount of information made available by new technologies must be managed responsibly in the future.
5. **Clean Environments and Healthy Communities:** Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Mobility Plan identifies key corridors within the Project’s transportation study area as components of various “mobility-enhanced networks.” Though no new specific improvements have been identified and there is no schedule for implementation, the mobility-enhanced networks represent a focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The Project would be designed consistent with the mobility-enhanced networks and would not impede the City’s ability to implement improvements along the streets surrounding the Project Site.

The Mobility Plan also designates street and sidewalk width standards based on the functional classification. LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right of way standards consistent with the Mobility Plan. The Project is not required to make additional dedications to the public right-of-way along Sunset Boulevard. There is an existing 100’ of right-of-way (50’ half right-of-way), which is to standards.

The Project Site is located within an AB 2097 Reduced Parking Area, which prohibits the City from imposing or enforcing minimum parking requirements. The Project does not require any parking. The Project would voluntarily provide 263 on-site parking spaces at ground and above-grade levels to be shared amongst all the of the uses on the Site. On-street parking is currently provided along Sunset Boulevard and Everett Street, On-street parking on the Project frontage along Sunset Boulevard and Everett Street will be restricted during the construction period.

The Project also supports initiatives of the Mobility Plan to create transit-oriented developments as it results in the construction of a residential mixed-use development on an infill site served by transit, supporting Metro ridership goals and enhancing transportation mobility. The Project is located in an urbanized area within proximity to transit stops that would encourage use of alternative transportation modes. The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping, sidewalk improvements, and pedestrian access to the Project Site.

Additionally, the Project would provide secured bicycle parking facilities. Furthermore, the Project’s design features would further reduce vehicle trips and would result in lower VMT per capita and lower work VMT per employee compared to the average for the area.

The Project's proposed land use and design features including site access; pedestrian, bicycle, and transit accessibility; and loading areas, would not conflict with the policies of the Mobility Plan 2035. Sunset Boulevard at the western boundary of the Project Site is part of the Bicycle Enhanced Network, Pedestrian Enhanced Districts, and Transit Enhanced Network. Vin Scully Avenue is part of the Bicycle Enhanced Network and Pedestrian Enhanced Districts. Marion Avenue is part of the Neighborhood Enhanced Network. Beaudry Avenue west of Sunset Boulevard is part of the Bicycle Enhanced Network and Pedestrian Enhanced Districts. The Project would not conflict with the implementation of future projects in the public right-of-way on these networks.<sup>243</sup>

As detailed in Appendix D of the Transportation Assessment (Appendix K-1) and summarized above, the Project is consistent with all applicable policies of the Mobility Plan and the Project does not interfere with other policies identified in the Mobility Plan. Therefore, the Project is consistent with the Mobility Plan.

### **Plan for a Healthy Los Angeles**

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan (Plan for a Healthy Los Angeles) introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues. The components of the Plan for a Healthy Los Angeles focus on health and wellness through increased quality of life, economic development, equity and environmental justice, housing and community stability, mobility, and open space.

The Project does not conflict with the Plan for a Healthy Los Angeles. It strives to reduce vehicle miles traveled and greenhouse gas emissions by providing mixed use development with a variety of land uses in a neighborhood with high walkability and transit access.<sup>244</sup>

In summary, the Project would promote healthy living where active travel modes are encouraged. The Project would support multi-modal mobility options to improve the convenience of making trips without the use of a personal automobile. The Project includes pedestrian enhancements surrounding the Project Site that would provide better connections to transit stops.

The Project would also provide bicycle parking facilities to encourage bicycling and walking for residents, employees, and visitors to the Project Site. The Project would expand residential and employment opportunities in proximity of residential and commercial areas, destinations, and other neighborhood services in a diverse urban area.

Finally, the Project is estimated to generate lower VMT per capita than the average for the area. VMT directly contributes to GHG emissions; as such, a reduced VMT per capita also reduces GHG per capita.

The Project prioritizes safety and access for all individuals utilizing the Project Site and does not hinder other goals and policies identified in the Plan for a Healthy Los Angeles. Thus, based on

<sup>243</sup> Table 8, Transportation Assessment, Fehr & Peers, October 2023.

<sup>244</sup> Table 8, Transportation Assessment, Fehr & Peers, October 2023.

the above and as detailed in Appendix D of the Transportation Assessment included as **Appendix K-1** of this SCEA, the Project is consistent with the policies included in the Plan for a Healthy Los Angeles.

### **Silver Lake-Echo Park-Elysian Valley Community Plan**

The Project does not conflict with the transportation components of the Silver Lake-Echo Park-Elysian Valley Community Plan. The Project's prioritization of pedestrian and bicycle access, along with unbundled parking, coincide with the City's goals of increasing the ease by which transit riders, cyclists, and pedestrians can access the site. Additionally, the Project concentrates new residential development on a major transportation corridor, an important objective of the Community Plan.<sup>245</sup>

As previously discussed, the Project incorporates bicycle parking that would improve mobility for pedestrians and promote the use of alternative transportation modes.

In addition, the Project would implement TDM strategies to further reduce the number of single-occupancy vehicle trips generated by the Project.

Further, with the reduction of 13 existing driveways to three, the Project would be designed to minimize vehicle/pedestrian conflicts. Thus, based on the above and as outlined in Appendix D of the Transportation Assessment included as **Appendix K-1** of this SCEA, the Project would not conflict with applicable policies of the Community Plan addressing the circulation system.

### **LAMC**

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. As discussed in Section 3, Project Description, of this SCEA, consistent with the requirements set forth in the LAMC, the Project would provide 183 bicycle parking spaces (including 162 long-term spaces and 21 short-term spaces); therefore, the Project would be consistent with LAMC Section 12.21.A.16.

LAMC Section 12.26J, the TDM Ordinance (Ordinance No. 168,700, effective March 31, 1993) establishes trip reduction requirements for non-residential projects, in addition to non-residential components of mixed-use projects in excess of 25,000 square feet. The Project is not required to comply with the City's TDM Program because its commercial use component does not exceed 25,000 square feet.

While not subject to the TDM Ordinance, the Project would incorporate TDM measures to encourage use of alternative transportation modes by providing on-site bicycle parking facilities, providing connection to off-site pedestrian facilities, and concentrating development in proximity to transit opportunities, consistent with the requirements set forth in the TDM Ordinance. Thus, the Project would not conflict with the LAMC.

<sup>245</sup> Table 8, Transportation Assessment, Fehr & Peers, October 2023.

## Vision Zero Action Plan/Vision Zero Corridor Plan

The primary goal of Vision Zero is to eliminate traffic deaths in the City of Los Angeles by 2025 through a number of strategies, including modifying the design of streets to increase safety. Vision Zero implements projects that are designed to increase safety for the most vulnerable road users. The City has identified numerous streets as part of the High Injury Network (HIN), which is a network of streets where strategic investments will have the biggest impact on reducing death and severe injury. The City has also created an Action Plan identifying the types of improvements that will be implemented.

The Project does not conflict with the goals and objectives set forth in Vision Zero Los Angeles and would not conflict with the implementation of future Vision Zero projects in the public right-of-way. The western boundary of the Project is Sunset Boulevard, which is identified as part of the HIN. The Project's proposed auto access is on Sunset Boulevard and would reduce the number of existing curb cuts along Project frontage to three. Additionally, vehicles exiting the Project via Driveways A and B onto Sunset Boulevard are limit to right-turns only to reduce the likelihood of conflict with northbound vehicles on Sunset Boulevard. The Project is not located in a Safe Routes to School program area.<sup>246</sup>

Thus, the Project would not conflict with Vision Zero.

## Citywide Design Guidelines

The Citywide Design Guidelines identify urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. As previously discussed, the Design Guidelines are organized around three design approaches: Pedestrian-First Design, 360-Degree Design, and Climate-Adapted Design.

Per the TAG, the Pedestrian-First Design policies are applicable to this analysis. The Pedestrian-First Design approach focuses on design strategies that “create human scale spaces in response to how people actually engage with their surroundings, by prioritizing active street frontages, clear paths of pedestrian travel, legible wayfinding, and enhanced connectivity. Pedestrian-First Design promotes healthy living, increases economic activity at the street level, enables social interaction, creates equitable and accessible public spaces, and improves public safety by putting eyes and feet on the street.” The Pedestrian-First Design guidelines are as follows:

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

<sup>246</sup> Table 8, Transportation Assessment, Fehr & Peers, October 2023.

The Project would not conflict with the circulation components of the Citywide Design Guidelines. The guidelines call for incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience and promoting a safe, comfortable, and accessible pedestrian experience.<sup>247</sup>

The Project would enhance the pedestrian experience through its design via the inclusion of pedestrian amenities and would include accessible sidewalks and walkways that provide pedestrian access throughout the Project Site. The corner of Sunset Boulevard and Everett Street also includes an approximately 700 square foot public plaza accessible from the street frontages.

The Project would also provide 83 new on-site trees to provide adequate shade and a more comfortable environment for pedestrians. In addition, the Project would include low-level exterior lights adjacent to the building and along pathways that would serve to enhance the safety of pedestrians at night.

All vehicular access to the Project Site would be provided separately from the pedestrian and bicycle access points. The proposed driveways would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access and would incorporate pedestrian warning systems, as appropriate.

Thus, based on the above and as outlined in Appendix D of the Transportation Assessment, included as **Appendix K-1** of this SCEA, the Project is consistent with the applicable policies of the Design Guidelines.

### **2020–2045 RTP/SCS**

Objective 6 of the 2020–2045 RTP/SCS calls for a circulation system that is coordinated with land uses and densities and adequate to accommodate traffic, and for the expansion and improvement of public transportation service. The Project Site is located in an urbanized area and designated PGAs, including an HQTAs, NMA, and Livable Corridor, that is well served by public transit. The Project would include various streetscape improvements and ground level commercial uses that would activate the surrounding pedestrian environment and enhance walkability. Furthermore, the Project would provide bicycle parking per LAMC requirements. Thus, the Project would coordinate land use and circulation by promoting opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling.

### **Cumulative Impacts**

**Less Than Significant Impact.** The cumulative analysis takes into consideration the nine Related Projects within 0.5 mile of the Project Site. Similar to the Project, the Related Projects would be individually responsible for complying with relevant plans, programs, ordinances, and policies.

A cumulative impact could occur if the Project as well as Related Projects located on the same block were to preclude the City's ability to implement relevant plans, programs, ordinances, and policies. These Related Projects in combination would have a less-than-significant cumulative

<sup>247</sup> Table 8, Transportation Assessment, Fehr & Peers, October 2023.

impact. Accordingly, the Project would not contribute to significant cumulative impacts in conflict with transportation policies and standards and thus, would not conflict with City transportation plans, programs, ordinances, and policies.

Thus, overall, implementation of the Project, together with the Related Projects, would not create inconsistencies with the Mobility Plan, Plan for a Healthy Los Angeles, Community Plan, LAMC, Vision Zero, and the Citywide Design Guidelines.

Thus, the Project and the Related Projects would not result in a cumulative impact that would preclude the City from serving the transportation needs as defined in its adopted programs, plans, ordinances, or policies. Each of the Related Projects considered in this cumulative analysis of consistency with programs, plans, policies, and ordinances would be separately reviewed and approved by the City, including verification regarding their consistency with applicable policies.

Therefore, the Project, together with the Related Projects would not create inconsistencies with respect to the identified programs, plans, policies, and ordinances addressing the circulation system and cumulative impacts would be less than significant.

**b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less Than Significant.** SB 743, which went into effect in January 2014, requires the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS.

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its *Transportation Assessment Guidelines* (July 2019, updated July 2020, updated August 2022), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743. The TAG identifies distinct thresholds regarding significant VMT impacts for the seven Area Planning Commission (APC) areas in Los Angeles.

The Project Site is located within the East Los Angeles APC, for which the following thresholds have been established:

- Household VMT per Capita: 7.2
- Work VMT per Employee: 12.7

Per the VMT Calculator User Guide (May 2020), work VMT per employee is not reported for projects with local-serving commercial uses (i.e., commercial uses less than 50,000 square feet), and is thus, considered to be less than significant. As such, the Project's 9,462 square feet of ground-floor commercial space would not result in a significant work VMT impact.<sup>248</sup>

Based on the Project's land uses and location, the Project is estimated to generate 11,632 daily household VMT, resulting in a daily household VMT per capita of 5.3. The average household VMT per capita would not exceed the East Los Angeles APC significance household impact threshold of 7.2. Therefore, the Project would not result in a significant VMT impact.<sup>249</sup>

Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and VMT impacts would be less than significant.

LADOT reviewed the Transportation Assessment and issued an approval confirming that the Project would not have a significant transportation impact, included as **Appendix K-2** of this SCEA.<sup>250</sup>

## Project Design Features

The Project would implement the following project design features:

### PDF-TRAN-1: Construction Traffic Management Plan

Pursuant to City's requirements, prior to the start of construction, a Construction Traffic Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will include, but not be limited to, the following measures, as appropriate:

- To accommodate Project construction, closure of the northbound parking/PM peak hour bus lane on Sunset Boulevard along the Project frontage is anticipated between 6:30 AM and 4:00 PM, so as not to interfere with PM peak hour buses or the Dodger Stadium Express bus route during home games. During construction of the Project, a pedestrian canopy will be constructed to maintain access to the sidewalk, bus stop, and crosswalks at Marion Avenue.
- The existing land uses near the vicinity of the Project Site will remain open throughout construction. Pedestrian and vehicular access to properties located adjacent and near to the Project Site would remain open and unobstructed for the duration of construction. No loss of ADA pedestrian access to transit stops, stations, or facilities is anticipated.

<sup>248</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>249</sup> Transportation Assessment, Fehr & Peers, October 2023.

<sup>250</sup> Approval Letter, Los Angeles Department of Transportation, December 7, 2023.

On-street parking on the Project frontage along Sunset Boulevard and Everett Street will be restricted during the construction period.

- Staging and parking areas during construction would initially be located at an off-site location to be determined at a future date. No staging and worker parking would occur on public streets and rights-of-way.
- Workers would park in the Project's subterranean parking garage after it is constructed.
- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

#### **PDF-TRAN-2: Transportation Demand Management (TDM) Measures:**

Although the Project is not expected to cause any significant transportation impact or non-CEQA operational issues in accordance with the TAG, the Project proposes

the following TDM measures to reduce trips, traffic, VMT, and greenhouse gas emissions (GHGs):

- Reduced parking supply (263 spaces) compared to Los Angeles Municipal Code (LAMC) baseline requirements (621 spaces), in accordance with AB 2097.
- Unbundled cost of parking from residential leases.
- Promotions and marketing program (kiosk, coordinator, pamphlets, website) to inform travelers about different transportation options and the effects of their travel choices.
- Bicycle parking per LAMC.

### Cumulative Impacts

**Less Than Significant.** Cumulative effects of development projects are determined based on the consistency with the air quality and GHG reduction goals of the RTP/SCS in terms of development location, density, and intensity. As detailed in the TAG, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., household VMT per capita or work VMT per employee) in the project impact analysis, a less than significant impact conclusion is sufficient in demonstrating there is no cumulative VMT impact, as those projects are already shown to align with the long-term VMT and GHG goals of the RTP/SCS.

As described above, the Project would not result in a significant VMT impact. Therefore, the Project is not anticipated to result in a cumulative VMT impact. Furthermore, the Project would also contribute to the productivity and use of the regional transportation system by providing employment and housing near transit and encouraging active transportation by providing new bicycle parking infrastructure and active street frontages, in line with RTP/SCS goals. Thus, the Project is consistent with the RTP/SCS goal of maximizing mobility and accessibility in the region.

As such, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts associated with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant.

**c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less Than Significant Impact.** Pursuant to the TAG (Threshold T-3) the determination of significance regarding hazards due to a geometric design feature or incompatible uses should be based on commonly-accepted traffic engineering design standards (such as those identified in LADOT MPP Section 321, regarding driveway design) while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance and physical conditions such as curves or grade changes, and the project's proximity to streets identified in the High Injury Network or the Safe Routes to School program.

Vehicular access to the Project Site would be provided via two stop-controlled driveways and one-signalized driveway that would provide access to structured parking. There are currently 13 driveways serving the Project Site along Sunset Boulevard. The Project proposes reducing vehicular access points to three driveways (Access A, B, and C) on Sunset Boulevard. The other existing vehicle access points to the Project site would be closed. Below is a description of the Project's proposed driveways:

- Access A: The Project proposes a left- and right-in/right-out only driveway off of Sunset Boulevard at the northern end of the Site. Outbound left-turns from this driveway would not be permitted.
- Access B: The Project proposes a left- and right-in/right-out only driveway off of Sunset Boulevard in the middle of the Site. Outbound left-turns from this driveway would not be permitted.
- Access C: The Project proposes a full-access driveway that would form the fourth leg (west facing) of the signalized intersection of Sunset Boulevard and Marion Avenue.

Each driveway would serve separate parking structures. The Project's vehicular driveways would be designed to the City standards and would provide adequate sight distance. They would not require the removal or relocation of existing public transit stops. Sunset Boulevard along the Project Site is part of the designated High Injury Network, however, the number of Project Site driveways along Sunset Boulevard would be reduced from 13 to three. Loading would be provided on-site. The new driveways would be designed in accordance with the regulatory standards and subject to the approval of LADOT and Bureau of Engineering.

The Project would modify the public right-of-way by providing the fourth leg (driveway) of the Sunset Boulevard and Marion Avenue signalized intersection. The Project proposes a full-access driveway at this intersection which would involve the modification of traffic signal equipment, curbs, ramps, and striping, as described in **Project Design Feature PDF-TRAN-3**.

Pedestrian and bicycle volumes are expected to increase to and from the Project Site. Nonetheless, the Project is designed to encourage and accommodate the increases in pedestrian and bicycle activity to and from the Project Site, though not in sufficient quantities to result in a significant conflict with the vehicles using the access points. Further, with the reduction of 13 existing driveways to three, the Project would be designed to minimize vehicle/pedestrian conflicts.

Currently, the sidewalks along the Project frontages provide a continuous pedestrian connection to the Project Site. The Project includes pedestrian enhancements surrounding the Project Site, such as landscaping and sidewalk improvements. Pedestrian access to the Project would be provided via street-facing entrances along Sunset Boulevard with a series of internal pedestrian walkways throughout the Project Site. This would allow easy access to the public right-of-way and other destinations. The Project's pedestrian access locations would be designed to the City standards and would not increase hazards by introducing entrances that would cause visibility issues or conflicts between vehicles and pedestrians.

Further, pedestrian and bicycle access to the Project Site would be separated from vehicular traffic. The Project improvements would not preclude or interfere with the implementation of any other future roadway improvements benefiting pedestrians or bicycles. The Project driveways would be designed and placed to provide adequate sight distance and pedestrian refuge areas to limit potential vehicular-bicycle or vehicular-pedestrian conflicts. Based on the above, the Project does not present geometric design hazards related to mobility or pedestrian accessibility.

### **Freeway Safety**

In May 2020, LADOT issued the City Freeway Guidance for land use proposals that are required to prepare a Transportation Assessment. The freeway safety analysis evaluates a proposed project's effects to cause or lengthen a forecasted off-ramp queue onto the freeway mainline and create speed differentials between vehicles exiting the freeway off-ramps and vehicles operating on the freeway mainline that could constitute a potential safety impact under CEQA.

The freeway safety analysis evaluates a proposed project's potential to cause or lengthen a forecasted off-ramp queue on the freeway mainline that could lead to a potential safety impact due to speed differentials between vehicles exiting the freeway off-ramps and vehicles traveling on the freeway mainline.

The TAG guidance on freeway safety analysis requires analysis of freeway off-ramps where a proposed project is projected to add 25 or more trips in either the morning or afternoon peak hour to be studied for potential queuing impacts. Because the Project is not projected to add 25 or more peak hour trips at any freeway off-ramps, a freeway ramp analysis is not required. The Project is estimated to generate no more than 53 new inbound trips during either peak hour, of which less than 10% would be expected to utilize any single freeway off-ramp. Therefore, the Project is not projected to cause a significant safety impact and no further analysis is required.

### **Project Design Features**

#### **PDF-TRAN-3: Modification of Sunset Boulevard and Marion Avenue intersection (Project driveway):**

The Project proposes a full-access driveway to form the fourth leg of the Sunset Boulevard and Marion Avenue signalized intersection. This would involve the modification of traffic signal equipment, curbs, ramps, and striping at this intersection, pursuant to approval by LADOT and other relevant City departments.

### **Cumulative Impacts**

**Less Than Significant Impact.** Of the nine Related Projects within 0.5 mile of the Project Site, only one of the Related Projects (No. 9) is located within the same block along Sunset Boulevard as the Project. Related Projects Nos. 6, 7, and 8 are along Sunset Boulevard but separated from the Project by substantial distances exceeding 240 feet. Related Project No. 9 is located at 1251 Sunset Boulevard, directly north of the Project Site. The proposed driveways would be approximately 150 feet from each other and would be part of a section of the roadway along the east side of Sunset Boulevard that would be reducing the driveway curb cuts from 13 to 3 (or 4 if

Related Project No. 9 is included). This is a positive point from the Vision Zero review, which is relevant because the Sunset Boulevard is on a High Injury Network street. In addition, there are no driveway queueing issues in or out of the Project Site.<sup>251</sup>

Therefore, the Project would not result in cumulative impacts that would substantially increase hazards due to geometric design features, including safety, operational, or capacity impacts. Thus, Cumulative impacts would be less than significant.

**d) Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** While it is expected that the majority of construction activities for the Project would primarily be confined on-site, limited off-site construction activities, such as traffic control and flagging, may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures.

However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard management plans required by LADOT that would be implemented to ensure adequate circulation and emergency access along the Project Site would be maintained, as discussed in **Project Design Feature PDF-TRAN-1**.

With regard to operation, the Project would generate traffic in the Project vicinity and would result in limited modifications to Project Site access, primarily associated with access points. The Project would not include the installation of barriers along any surrounding streets such that emergency access would be modified or impeded. In addition, the Project would comply with LAFD access requirements and applicable LAFD regulations regarding safety.

Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable. Therefore, the Project would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts would be less than significant.

**Cumulative Impacts**

**Less Than Significant Impact.** As analyzed above, the Project would not result in inadequate emergency access. As with the Project, any driveway and/or circulation modifications proposed within or adjacent to the Related Project sites would be required to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. 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 LAMC Section 57.118, and which are required prior to the issuance of a building permit. Additionally, the additional traffic generated by the Related Projects would be dispersed throughout the study area and would not be concentrated to a specific location.

<sup>251</sup> Table 17, [Transportation Assessment](#), Fehr & Peers, October 2023.

Furthermore, since modifications to access and circulation plans are largely confined to a project site and the immediately surrounding area, a combination of project-specific impacts with those associated with other Related Projects that could lead to cumulative impacts is not expected. Therefore, Project impacts with respect to emergency access would not be cumulatively considerable, and cumulative impacts would be less than significant.

## 1.18 Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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"/>

### SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
- b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource;
- c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.

### ***Applicability to the Project***

As discussed below, the Project would implement **Mitigation Measure MM-TCR-1** tailored for the Project's location and development characteristics, which would be equal to or more effective than **PMM TCR-1**, would ensure that the Project's impacts regarding tribal cultural resources would be less than significant. As such, **PMM TCR-1** would not be incorporated as part of the Project.

### **Impact Analysis**

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k), or**
  - ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I 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.** 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 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.

Construction activities are anticipated to result in a maximum excavation depth of up to 62 feet bgs for the subterranean level, foundation elements, and grading of soils for the worse-case under the descending slope in the northeast corner of the Site.<sup>252</sup> Implementation of **Mitigation Measure MM-TCR-1** would reduce potential impacts related to tribal cultural resources to a less-than-significant level. In summary, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074, and potential impacts to tribal cultural resources would be less than significant.

<sup>252</sup> Page 13, Updated Geotechnical Engineering Investigation, Geotechnologies, September 6, 2023.

## Mitigation Measure

To ensure that Project impacts related to the inadvertent discovery of tribal cultural resources would be less than significant, the following mitigation measure is required:

### **MM-TCR-1: Inadvertent Discovery Of Tribal Cultural Resources**

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who

has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

In summary, with implementation of **Mitigation Measure MM-TCR-1**, the Project's potential impacts to tribal cultural resources would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** There are nine Related Projects within 0.5 mile of the Project Site. None of the Related Projects are located within the same block as the Project. Although impacts to tribal cultural resources tend to be site-specific, cumulative impacts would occur if the Project, Related Projects, and other future development within the Community Plan area affected the same tribal cultural resources and communities. All Project development would occur within the boundaries of the Project Site, and, as discussed above, there are no tribal cultural resources identified on the Project Site. However, in the event that tribal cultural resources are uncovered, the Project and each Related Project would be required to comply with the applicable regulatory requirements discussed above.

In addition, Related Projects would be required to comply with the City's standard mitigation measure regarding inadvertent discovery of tribal cultural resources and the consultation requirements of AB 52, as applicable, to determine and mitigate any potential impacts to tribal cultural resources. Therefore, cumulative impacts related to tribal cultural resources would be less than significant and would not be cumulatively considerable.

## 1.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<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"/>

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

**L-1** Wastewater Response, Los Angeles Bureau of Sanitation, October 17, 2023

**L-2** Water Response, Los Angeles Department of Water and Power, December 1, 2023

### **SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures**

**PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:

- a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- b) Inclusion of a waste management plan that promotes maximum C&D diversion.
- c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).
- d) Reuse of existing structure and shell in renovation projects.
- e) Development of indoor recycling program and space.
- f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities.
- g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.
- h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.
- i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.
- j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.

- l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- m) Provide education and publicity about reducing waste and available recycling services.
- n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could 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.

### ***Applicability to the Project***

Consistent with **PMM USSW-2**, the Project would comply with existing regulatory requirements that are already incorporated in the Project, including adherence to applicable regulations of Title 24 of the California Building Code including re-using and minimizing construction and demolition debris, diversion from local landfills, and utilizing on-site recycling. Additionally, there is adequate landfill capacity in the region to accommodate Project-generated waste, and no Project-specific impacts related to solid waste are necessary. Since the Project would not have the potential to generate solid waste in excess of State or local standards and incorporates regulatory compliance measures that are consistent with applicable solid waste reduction measures under **PMM USSW-2**, this measure would not be incorporated into the Project.

**PMM USWW-1:** In accordance provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

### ***Applicability to the Project***

Consistent with the above measure, and as discussed in the impact analysis below, the Project would ensure that there is sufficient wastewater infrastructure capacity to serve the Project. As no Project-specific impact would occur, **PMM USWW-1** would not be incorporated into the Project.

**PMM USWS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
- b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
- c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
- d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for nonpotable uses onsite.

### ***Applicability to the Project***

As described in the impact analysis below, available water resources are available to serve the Project, and no impacts regarding water supply are anticipated to occur. Furthermore, the Project would be required to comply with current water conservation measures required by Title 24 and the City's Green Building Code, which includes measures that are consistent with **PMM USWS-1**. As the applicable regulatory requirements are equal to or more effective than **PMM USWS-1**, it is not incorporated into the Project.

### **Impact Analysis**

- a) **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power,**

**natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less Than Significant Impact.**

**Water**

**Construction**

Project construction activities would require water for a variety of activities, including but not limited to dust control, cleaning of equipment, excavation/export, removal and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of Project water use during construction averages 3,020 gallons/acre/day.<sup>253</sup> With a 2.459 acre Site, the Project would use an estimated 7,426 gallons per day. The estimated construction-period water demand will be less than the estimated operational demand of the Project, which, as discussed below, can be accommodated by existing infrastructure. Thus, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. As such, water needs during construction of the Project would not result in the construction of new or expanded water distribution facilities, and the existing off-site LADWP water infrastructure system would be adequate to provide for the water flow necessary to serve the Project during construction. Impacts on water infrastructure due to construction activity would therefore be less than significant.

The Project would also require construction of new, on-site water distribution lines to serve the new buildings. Such improvements/activities would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with 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. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

While trenching and installation activities could temporarily affect traffic flow and access on the adjacent streets and sidewalks, a Construction Traffic Management Plan would be implemented pursuant to **Project Design Feature PDF-TRAN-1**, as discussed under Checklist Section 17, Transportation, of this SCEA. This Construction Traffic Management Plan, which would be reviewed and approved by LADOT, would ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties is maintained during the construction period. Overall, Project construction activities would not 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. Therefore, Project construction-related water infrastructure impacts would be less than significant.

**Operation**

LADWP maintains water infrastructure to the Project Site. There is one 12-inch water main in Sunset Boulevard that turns into a 12-inch main in Everett Street that can be used to establish

<sup>253</sup> Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition).

fire and domestic services. There are no known deficiencies.<sup>254</sup> In addition to providing domestic water service, LADWP provides water to the Project Site for fire protection services in accordance with the City’s Fire Code (LAMC Chapter V, Article 7). There are four existing fire hydrants along Sunset Boulevard within 240 feet of the Site.

Based on the land use shown in LAMC Table 57.507.3.3, the required fire flow for the Project Site is expected to be 4,000 gallons per minute (gpm) from four fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch (psi), which corresponds to the High Density Residential and Commercial Neighborhood Category. Therefore, the Project would be required to comply with LAMC Section 57.507.3.

As shown in **Table 5.19.1**, the Project operation would consume approximately 42,159 gpd (or 0.042 mgd) of water and discharge an equivalent amount of wastewater. It should be noted that this 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).

**Table 5.19-1**  
**Project Estimated Water Consumption and Wastewater Generation**

Land Use	Size	Rates	Total (gpd)
<b>Proposed Project</b>			
Residential – Studio	13 units	75 gallons / unit	975
Residential – 1-bedroom	230 units	110 gallons / unit	25,300
Residential – 2-bedroom	79 units	150 gallons / unit	11,850
Residential – 3-bedroom	5 units	190 gallons / unit	950
Commercial Restaurant	9,462 sf	300 gallons / 1,000 sf	2,837
Pool	45,000 gallons	Assume 2x yearly filling	247
<b>Proposed Total</b>			<b>42,159</b>
Note: sf = square feet; gpd = gallons per day Rates: Los Angeles Bureau of Sanitation, Sewage Generation Factor, effective date April 6, 2012. Wastewater generation is assumed to equal water consumption. Per the LADWP: “For estimating a project’s indoor water demand, we use applicable sewer generation factors (sgf).” Table: CAJA Environmental Services, October 2023.			

According to the LADWP, for any project that is consistent with the City’s General Plan, the projected water demand associated with that project is considered to be accounted for in the 2020 Urban Water Management Plan.<sup>255</sup>

As was shown in the Land Use analysis of this SCEA, the Project would be consistent with the City’s General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in City Ordinance No.

<sup>254</sup> Water Response, Los Angeles Department of Water and Power, December 1, 2023.

<sup>255</sup> LADWP, UWMP, 2020: [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpIn.jsessionid=0f8GKV7FhZyXG4fp4vzmdzl6ppkmjD1WSc5IN97FyxhXZTsnmJ1J!-1538674557?\\_afLoop=1190897232113430&\\_afWindowMode=0&\\_afWindowId=null#%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D1190897232113430%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D4rq085lkg\\_4](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpIn.jsessionid=0f8GKV7FhZyXG4fp4vzmdzl6ppkmjD1WSc5IN97FyxhXZTsnmJ1J!-1538674557?_afLoop=1190897232113430&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D1190897232113430%26_afWindowMode%3D0%26_adf.ctrl-state%3D4rq085lkg_4)

180822<sup>256</sup> and in the LAGBC<sup>257</sup> to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements.

Demographic projections for the LADWP service area are based on SCAG’s demographic growth forecast for their 2020-2045 RTP/SCS. The 2020 UWMP provides demographic projections in 5-year increments from 2025 to 2045.<sup>258</sup> Based on the City’s VMT Calculator Documentation, the Project could generate a new residential population of approximately 773 residents.<sup>259</sup> The estimated 773 new residents generated by the Project would represent approximately 0.67 percent of the population growth forecasted by SCAG’s 2020–2045 RTP/SCS in the City of Los Angeles Subregion between 2023 and 2027.<sup>260</sup> Therefore, no Project impacts related to water supply would occur and the Project would be adequately served by the LADWP.

The 2020 UWMP was adopted in May 2021 and projects a demand of 642,600 AFY in 2025 (average weather year).<sup>261</sup> The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2020-2045 RTP/SCS.<sup>262</sup> The 2020-2045 RTP/SCS models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).<sup>263</sup>

In general, projects that conform to SCAG’s 2020-2045 RTP/SCS demographic projections and are in the City’s service area are considered to have been included in LADWP’s water supply planning efforts in the UWMP. The Project is consistent with the General Plan designation and Community Plan and zoning. In terms of the City’s overall water supply condition, the water requirement for any project that is consistent with the City’s General Plan has been taken into account in the planned growth of the water system. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project.

To demonstrate LADWP’s water supply reliability, the UWMP summarizes the water demands and supplies for single-dry year conditions through 2045, which represents the City’s planned

<sup>256</sup> Los Angeles, Ordinance No. 180822: [http://clkrep.lacity.org/onlinedocs/2009/09-0510\\_ord\\_180822.pdf](http://clkrep.lacity.org/onlinedocs/2009/09-0510_ord_180822.pdf)

<sup>257</sup> Los Angeles, Green Building Code: <http://www.ladbs.org/forms-publications/forms/green-building>

<sup>258</sup> 2020 Urban Water Management Plan, Los Angeles, page ES-6.

<sup>259</sup> City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, City of Los Angeles VMT Calculator Documentation Guide, Table 1. City of Los Angeles VMT Calculator Documentation, v1.3. LADOT population and employee numbers are shown on Table 1: [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). As shown, multi-family residential is 2.25 persons per unit and affordable family is 3.14 persons per unit.

<sup>260</sup>  $773 \text{ persons} / 115,517 \text{ persons} \times 100\% = 0.67\%$

<sup>261</sup> 2020 Urban Water Management Plan, Los Angeles, Exhibit ES-S.

<sup>262</sup> 2020 Urban Water Management Plan, Los Angeles, page 1-5.

<sup>263</sup> SCAG, 2020-2045 RTP/SCS, Demographic and Growth Forecast, page 3.

supply projected to meet projected water demands under the most critical hydrologic conditions.<sup>264</sup> In 2025, the total water demand and total supplies equals 674,700 acre-feet and grows to 747,000 acre-feet by 2045 for a single dry year. As required by the California Water Code (CWC) Section 10632, LADWP has six standard water supply shortage levels and corresponding response actions, including withdrawing from available emergency storage along the Los Angeles Aqueduct System and local groundwater basins.

Larger developments (e.g., residential projects with 500 or more units) are required to prepare and obtain approval of a Water Supply Assessment (WSA) from LADWP per SB 610. This Project contains 327 units which is below the threshold size of 500 units and does not require a WSA.

Based on the above, the Project would not exceed the available capacity of existing water facilities, including the distribution infrastructure, that would serve the Project Site. Accordingly, the Project would not 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. Therefore, the Project's operational impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on water infrastructure is the vicinity of the Project Site (i.e., the area served by the same water infrastructure as the Project). Development of the Project and the nine Related Projects would cumulatively increase demands on the existing water infrastructure system. However, as with the Project, the Related Projects would be subject to LADWP requirements to ensure that the existing water infrastructure is adequate to meet the domestic and fire demands.

In addition, LADWP will continue to implement and update its Water Infrastructure Plan (WIP), for needed water system infrastructure improvements and maintenance.<sup>265</sup> Furthermore, in accordance with City requirements, prior to ground disturbance, the Related Projects would be required to coordinate with LADWP to identify the locations and depths of all lines, and LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service associated with the Related Projects. LADWP would also review and approve all appropriate connection requirements, pipe depths, and connection location(s) associated with the Related Projects.

Additionally, as with the Project, the Related Projects would be required to implement a Construction Traffic Management Plan to ensure that adequate and safe access remains available within and near the Related Projects during construction activities. Therefore, cumulative water infrastructure impacts would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

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<sup>264</sup> 2020 Urban Water Management Plan, Los Angeles, page ES-20.

<sup>265</sup> LADWP, 2018–2019 Water Infrastructure Plan.

## Wastewater

### Construction

Construction activities for the Project could result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas provided by the construction contractor, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows that would result in the need for new or expanded wastewater treatment facilities.

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrades and/or relocations of existing wastewater infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for utility lines and connections to the public infrastructure and would be limited to the on-site wastewater distribution, and minor off-site work associated with connections to the public main (no upgrades to the public main are anticipated, as discussed below).

Project contractors would coordinate with the City to identify the locations and depth of all lines prior to ground disturbance. Furthermore, the City would be notified in advance of proposed ground disturbance activities in order to avoid disruption of service. In addition, as set forth in **Project Design Feature PDF-TRAN-1** included under Checklist Section 17, Transportation, of this SCEA, a Construction Traffic Management Plan would be implemented during Project construction to ensure that adequate and safe pedestrian and vehicle access remains available within and near the Project Site during construction activities. The Construction Traffic Management Plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Overall, Project construction would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts to the wastewater conveyance or treatment system associated with construction of the Project would be less than significant.

### Operation

LASAN operates and maintains the wastewater treatment, reclamation, and collection facilities serving most of the City of Los Angeles incorporated areas, including the Project Site, as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance system for treatment at the Hyperion Treatment Plant (HTP) System. The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at the HTP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant) and the existing average daily flow for the

system is approximately 300 mgd. The HTP currently treats an average daily flow of approximately 275 mgd.<sup>266</sup> Thus, there is approximately 175 mgd available capacity.

The sewer infrastructure in the vicinity of the Project includes an existing 8-inch line on Sunset Boulevard.<sup>267</sup> The sewage from the existing 8-inch line feeds into a 12-inch line on Temple Street, which feeds into an 18-inch line on Fremont Avenue before discharging into a 36-inch sewer line on 2nd Street.<sup>268</sup>

As shown in **Table 5.19-1**, based on sewage generation factors established by City of Los Angeles Department of Public Works, Bureau of Sanitation (LASAN), the Project would generate an increase of approximately 42,159 gpd of wastewater, or approximately 0.042 million gallons per day (mgd). The Project's average daily wastewater flow of 0.042 mgd would represent substantially less than one percent of the available capacity of the Hyperion Service Area.

During the Project's permitting process, further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. As such, operations-related wastewater infrastructure impacts would be less than significant.

### Cumulative Impacts

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on the wastewater conveyance system is the area that includes the Project Site and the Related Projects and other nearby development projects that would potentially utilize the same infrastructure as the Project. Under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), LASAN assesses the anticipated wastewater flows from development projects at the time of connection and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction.

In addition, new development projects would also be subject to LAMC Section 64.11 and Section 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, Related Projects in the City of Los Angeles would also be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with LASAN and comply with all applicable City and State water conservation programs and sewer allocation ordinances.

<sup>266</sup> <https://www.lacitysan.org/san/faces/wcnavexternalld/s-lsh-wwd-cw-p-hwrp?adf.ctrlstate=e9g2enwiy5&afrLoop=2223629005130851#!>

<sup>267</sup> NavigateLA with Sewer layer: <http://navigatela.lacity.org/index01.cfm>.

<sup>268</sup> [Wastewater Response](#), Los Angeles Bureau of Sanitation, October 17, 2023.

Therefore, the cumulative impact related to the construction or expansion of wastewater infrastructure would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

## **Stormwater**

### **Construction**

As discussed under Checklist Section 10, Hydrology and Water Quality, the Project would implement BMPs designed to contain stormwater or construction watering on the Project site such that runoff does not impact off-site drainage facilities or receiving waters. Therefore, there would be no incremental increase in runoff volumes during construction of the Project. Additionally, through compliance with applicable City grading permit regulations, construction activities for the Project would not substantially alter the Project Site drainage patterns in a manner that would result in flooding on- or off-site. As such, Project construction would not create runoff that would exceed the capacity of existing or planned drainage systems and no new or relocated stormwater facilities would be required during construction. Accordingly, impacts would be less than significant.

### **Operation**

With regard to stormwater drainage, as discussed above in Checklist Section 10, Hydrology and Water Quality, at buildout of the Project, the Project Site would be comprised of approximately 65-percent impervious areas. In addition, BMPs would be implemented to control runoff. As the Project Site currently does not have BMPs for the management of pollutants or runoff, the Project BMPs would control stormwater runoff and ultimately result in a minor decrease in runoff compared to existing conditions. Consequently, the Project would decrease the amount of stormwater runoff discharging into the existing storm drainage infrastructure. Accordingly, impacts would be less than significant.

As such, based on the above, construction and operation of the Project would not create runoff that would exceed the capacity of existing or planned drainage systems, and impacts would be less than significant.

## **Cumulative Impacts**

**Less Than Significant Impact.** Stormwater from each of the nine Related Projects and other nearby development projects would be collected on each of the respective sites, retained and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first 0.75 inch of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the cumulative impact related to the construction or expansion of stormwater infrastructure would be less than significant and the Project's contribution to cumulative stormwater impacts would not be cumulatively considerable.

## Electrical Power

### Construction

The existing power service in the vicinity of the Project Site is supplied by LADWP. Construction activities on the Project Site would require electrical power to convey water for dust control and for lighting, power tools and equipment, and construction trailers. Overall, demolition and construction activities would require minimal electrical consumption. As described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for the Project, and since the demand for electricity during construction would be minimal, there is also enough capacity to provide service for construction activities. The demand would be supplied from existing electrical services within the Project Site and would not affect other services. Thus, construction activities would not be expected to have any adverse impact on available electricity supplies.

The Project would require construction of new electrical mains to serve the new buildings and facilities. Construction impacts associated with electrical infrastructure upgrades would primarily be confined to trenching. Installation of electrical infrastructure would be limited to on-site electrical distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required to connect to the public main. Infrastructure improvements would comply with all applicable requirements and regulations set forth by LADWP, which would ensure that service disruptions and potential impacts are minimized. In addition, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see **Project Design Feature PDF-TRAN-1** under Checklist Section 17, Transportation, of this SCEA). Therefore, construction of the Project would not result in significant impacts related to electrical power.

### Operation

Operation of the Project would require electricity for the residential and commercial uses on site. As shown in **Table 5.6-2**, the Project's demand for electricity would be approximately 1,941,475 kWh per year, which is less than 0.01 percent of LADWP's projected sales in 2027–2028 fiscal year.<sup>269</sup> Furthermore, the Project would implement any necessary new lines, connections, and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project. Therefore, operation of the Project would not result in significant impacts related to electrical power.

Overall, based on the above, construction and operation of the Project would not result in an increase in demand for electricity that exceeds available supply or distribution infrastructure capabilities and would not result in the construction of new electricity facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Thus, impacts would be less than significant.

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<sup>269</sup> LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

## Cumulative Impacts

**Less Than Significant Impact.** The geographic context for a cumulative analysis regarding electricity is LADWP’s service area. Implementation of the Project, in conjunction with the Related Projects, would cumulatively increase demand for electricity supplies and infrastructure capacity. The Project would account for less than 0.01 percent of LADWP’s projected sales for the Project’s build-out year. Although future development would result in the irreversible use of renewable and nonrenewable electricity resources during project construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP’s service area. Furthermore, like the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project’s contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP’s 2017 Power Strategic Long-Term Resources Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP’s environmental priorities and reliability standards. LADWP has indicated that the Power Strategic Long-Term Resources Plan incorporates the estimated electricity requirement for the Project. The Power Strategic Long-Term Resources Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary.

Each of the Related Projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, the Project’s contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

## Natural Gas

### Construction

Construction activities, including the construction of the new buildings and associated facilities, typically do not involve the consumption of natural gas. Accordingly, no demand for natural gas would be generated by construction. However, the Project would require construction of new natural gas mains to serve the new buildings and associated facilities. Construction impacts associated with natural gas infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Although no upgrades to the public infrastructure are anticipated, minor off-site work may be required to connect to the public infrastructure.

Therefore, as part of the Project, a Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access (see **Project Design Feature PDF-TRAN-1** under Checklist Section 17, Transportation, of this SCEA). Installation of any required natural gas infrastructure are of a relatively short-term duration (i.e., months), would be similar to the activities as analyzed in this SCEA, and would cease to occur once the installation is complete. Therefore, construction of the Project would not result in significant impacts related to natural gas.

### Operation

As a public utility, the SoCal Gas is under jurisdiction of the California Public Utilities Commission (CPUC). Title 24 of the California Code of Regulations regulates energy consumption in new constructions. The standards regulate energy consumed in buildings for heating, cooling, ventilation and lighting. Title 24 is implemented through the local plan check and permit process. SoCal Gas' 2022 Gas Report states that residential gas demand is expected to decrease at an annual average rate of 1.7 percent whereas commercial and industrial demand is expected to increase at an annual rate of 1.5 and 0.2 percent. This is mainly due to increased efficiency of power plants and the statewide efforts to use renewable sources of energy for electricity generation.

As shown in **Table 5.6-2**, the Project's demand for natural gas would be 853,649 cf per year. As such, the Project would be consistent with the forecasted 2027 consumption in SoCal Gas's planning area.

Overall, based on the above, construction and operation of the Project would not result in an increase in demand for natural gas that would exceed available supply or distribution infrastructure capabilities and would not result in the construction of new natural gas facilities or the relocation or expansion of existing facilities, the construction, relocation, or expansion of which could cause significant environmental effects. Impacts would be less than significant.

### Cumulative Impacts

**Less Than Significant Impact.** The geographic context for the cumulative analysis of natural gas is SoCal Gas' service area. Buildout of the Project and Related Projects in SoCal Gas' service area is expected to increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. Based on the 2022 California Gas Report, the California Energy Commission estimates natural gas consumption within SoCal Gas' planning area will be approximately 2.23 billion cf per day in 2027. The Project would be consistent with the forecasted consumption in SoCal Gas's planning area. SoCal Gas' forecasts consider projected population growth and development based on local and regional plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, cumulative impacts would be less than significant.

### **Telecommunications**

**Less Than Significant Impact.** With regard to telecommunication facilities, the Project would require construction of new or extension of existing on-site telecommunications infrastructure to serve the proposed residential and commercial uses. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Thus, impacts related to telecommunication facilities would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the Related Projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. Thus, the Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**Less Than Significant Impact.** Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. LADWP provides water service to the Project Site. Water is supplied to the City from four primary sources: the Los Angeles Aqueducts, local groundwater, the Metropolitan Water District of Southern California (MWD), and recycled water. LADWP's 2020 Urban Water Management Plan provides water supply and demand projections in five-year increments to 2045, based on the demographic growth projections in SCAG's 2020–2045 RTP/SCS. The 2020 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Based on LADWP's 2020 Urban Water Management Plan water demand projections through 2040, projected water demand for the City would be met by the available supplies during an

average year, single-dry year, and multiple-dry year through the year 2045, as well as the intervening years (i.e., the Project buildout year of 2027).<sup>270</sup>

Based on the proposed land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of SB 610. As shown in **Table 5.19-1**, based on LASAN sewage generation factors, the Project would generate an increase in water demand of 42,159 gpd. This is a conservative calculation as it does not account for water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code. Based on LADWP's 2020 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2045. Therefore, the Project would not be anticipated to require new or expanded entitlements. As such, impacts associated with the availability of local or regional water supplies would be less than significant. Based on the above, LADWP would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Therefore, the impacts on water supply would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** The geographic context for the cumulative analysis of water supply is the LADWP service area. LADWP, as a public water service provider, is required to prepare and periodically update its urban water management plan to plan and provide for water supplies to serve existing and projected demands. LADWP's 2020 UWMP accounts for existing development within the City, as well as projected growth through the year 2045.

Implementation of the Project in combination with the Related Projects, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in LADWP's 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. It is unknown whether or not the Related Projects or other developments in the LADWP service area have been taken into account in the 2020 UWMP. Nonetheless, it can be assumed that any development projects that are not included in the 2020 UWMP would be required to identify water supplies prior to project approval.

In addition, larger projects with over 500 residential units would have to prepare a WSA pursuant to SB 610 to be reviewed and certified by LADWP to demonstrate adequate water supply. Related Project No. 8 requires a WSA, which has been reviewed and approved by LADWP, demonstrating that project's lack of impacts to water supply. Therefore, cumulative impacts on water supply would be less than significant.

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<sup>270</sup> Metropolitan Water District of Southern California, 2020 Regional Urban Water Management Plan, June 2021.

- c) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

### **Less Than Significant Impact.**

#### **Construction Impacts**

Construction activities for the Project would result in wastewater generation from construction workers on-site. However, wastewater generation during construction of the Project would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows and impacts would be less than significant.

#### **Operational Impacts**

The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. The Project Site lies within the Hyperion Sanitary Sewer System. The Project Site is within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. LASAN is responsible for the operation of wastewater treatment facilities in the City.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the HTP. The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) (consisting of 450 mgd at the HTP, 80 mgd at the Donald C. Tillman Water Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant) and the existing average daily flow for the system is approximately 300 mgd. The HTP currently treats an average daily flow of approximately 275 mgd.<sup>271</sup> Thus, there is approximately 175 mgd available capacity.

As shown in Error! Reference source not found., the Projects estimated wastewater generation is approximately 42,159 gpd, or 0.042 mgd. This is equal to less than one percent of the Hyperion Service Area capacity where the Project's wastewater would be treated. As such, the HTP has the capacity to treat the additional wastewater flows generated from the Project. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment within the Hyperion Service Area. Therefore, the Project would not result in a determination by the wastewater treatment provider that serves the Project Site that it does not have adequate capacity to serve the Project.

Further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. In addition, Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and

<sup>271</sup> <https://www.lacitysan.org/san/faces/wcnavexternalld/s-lsh-wwd-cw-p-hwrp?adf.ctrlstate=e9g2enwiy5&afrLoop=2223629005130851#!>

California Plumbing Code standards. Therefore, the Project would not cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

Based on the above, the Project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects. Thus, impacts would be less than significant.

### Cumulative Impacts

**Less Than Significant Impact.** The geographic context for the cumulative impact analysis on wastewater treatment facilities is the Hyperion Service Area. Implementation of the Project in combination with the nine Related Projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. The HTP has a capacity of approximately 550 mgd, and currently, the remaining available capacity at the HTP is approximately 250 mgd. The Project, which would generate much more wastewater than the Related Projects due to its size and land uses, would increase sewer demand by less than one percent of the Hyperion Service Area capacity. Thus, it can be assumed that the Related Projects would generate even less sewer demand. Furthermore, the Related Projects would have to demonstrate that the existing capacity of the sewer system would be able to accommodate the additional wastewater infrastructure demand created by the project. In addition, pursuant to LAMC Section 64.14, Related Projects would be required to obtain final approval of sewer capacity and connection permits during the Project's permitting process. Therefore, the HTP would have adequate capacity to serve the additional wastewater demand by the Project and future development projects within the HTP service area and no significant cumulative impacts would occur.

- d) **Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less Than Significant Impact.** While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

County landfills are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.<sup>272</sup> Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.<sup>273</sup>

<sup>272</sup> Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

<sup>273</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF>, accessed October 4, 2023.

Based on the information provided in the 2021 Countywide Integrated Waste Management Plan Annual Report, the remaining disposal capacity for the County’s Class III landfills is estimated at approximately 137.09 million tons.<sup>274</sup> In 2021, the total amount of solid waste disposed of at in-county Class III landfills, transformation facilities, and out-of-County landfills was approximately 11.1 million tons and 402,989 tons of inert waste at the County’s inert landfill.<sup>275</sup>

Of the remaining Class III landfill capacity in the County, approximately 71.3 million tons are available to the City (Antelope Valley, Lancaster, Sunshine Canyon).<sup>276</sup> The 2021 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 148.14 million tons in 2033, would exceed the 2021 remaining permitted Class III landfill capacity of 137.09 million tons.

As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

Wasteshed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.

The County’s unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 50.77 million tons. In 2021, approximately 0.403 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity, this capacity would be exhausted in 24 years.<sup>277</sup> Thus, the unclassified landfill serving the County has adequate long-term capacity.

While the City’s Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide

<sup>274</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF>, accessed October 4, 2023.

<sup>275</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF>, accessed October 4, 2023.

<sup>276</sup> Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its wasteshed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility’s wasteshed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

<sup>277</sup> County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&hp=yes&type=PDF>, accessed October 4, 2023.

waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

In 2018, the City disposed of approximately 3.3 million tons of solid waste at the County’s Class III landfills, approximately 1,968 tons at transformation facilities, and 214 million tons at the inert landfill.<sup>278</sup> The 3.3 million tons of solid waste accounts for approximately 4.6 percent of the total remaining capacity (71.3 million tons) for the County’s Class III landfills open to the City.<sup>279</sup>

The landfills that serve the City and the capacity of these landfills are shown on **Table 5.19-2**. As shown, the landfills have an approximate available daily intake of 11,839 tons.

**Table 5.19-2  
Landfill Capacity**

Landfill Facility	2021 Average Daily Disposal (tons/day)	Maximum Daily Disposal (tons/day)	Remaining Daily Capacity (tons/day)	Remaining Capacity (million tons)	Remaining Life (years)
<b>Class III Landfills (Open to the City)</b>					
Antelope Valley	2,645	5,548	2,903	9.24	8
Lancaster	397	5,100	4,703	9.84	20
Sunshine Canyon	7,830	12,100	4,270	52.22	16
<b>Total</b>	<b>10,872</b>	<b>22,748</b>	<b>11,876</b>	<b>71.3</b>	
<b>Inert Landfill (Open to the City)</b>					
Azusa	1,292	8,000	6,708	50.77	24
County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2021 Annual Report, December 2022, Appendix E-2 Table 4: <a href="https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&amp;hp=yes&amp;type=PDF">https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17389&amp;hp=yes&amp;type=PDF</a> , accessed October 4, 2023.					

The following analysis quantifies the Project’s construction and operation solid waste generation.

### Construction

As shown in **Table 5.19-3**, the Project would result in approximately 931 tons of construction and demolition waste, not accounting for any mandatory recycling.

**Table 5.19-3  
Project Demolition and Construction Waste Generation**

Building	Size	Rate	Total (tons)
<b>Demolition Waste</b>			
Residential	0 sf	127 pounds / sf	0
Non-residential	0 sf	158 pounds / sf	0
Asphalt	6,000 sf	75 pounds / sf	225
<b>Demolition Total</b>			<b>225</b>
<b>Construction Waste</b>			

<sup>278</sup> These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

<sup>279</sup> 3.3 million tons ÷ 74.13 million tons x 100% = 4.4%.

**Table 5.19-3  
Project Demolition and Construction Waste Generation**

<b>Building</b>	<b>Size</b>	<b>Rate</b>	<b>Total (tons)</b>
Residential	311,838 sf	4.39 pounds / sf	685
Non-residential	9,462	4.34 pounds / sf	21
<b>Construction Total</b>			<b>706</b>
<b>Total</b>			<b>931</b>
Over the entire total schedule of construction. Numbers have been rounded. sf = square feet, 1 ton = 2,000 lbs U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, Estimating 2003 Demolition and Materials Amounts, March 2009, Table 2-1, Table 2-2, Table 2-3, Table 2-4: <a href="https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts">https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts</a> 1 cubic foot of asphalt weighs 150 pounds. The asphalt at the site is assumed to be 6 inches thick. Table: CAJA Environmental Services, October 2023.			

Pursuant to the requirements of Senate Bill 1374<sup>280</sup>, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

In addition, pursuant to LAMC Sections 66.32 through 66.32.5 (Ordinance No. 181,519), the Project's construction contractor would be required to deliver all remaining construction and demolition waste generated by the Project to a certified construction and demolition waste processing facility. As discussed above, non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earthlike waste, is disposed of in inert waste landfills. Thus, although the total diversion rate may ultimately exceed 75 percent, this analysis conservatively assumes a diversion rate of 75 percent.

Pursuant to the requirements of SB 1374,<sup>281</sup> the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of its nonhazardous demolition and construction debris.

After accounting for mandatory recycling, the Project would result in approximately 233 tons of construction-related waste in the County's permitted inert landfill (i.e., Azusa Land Reclamation Landfill) throughout the construction period. This amount of construction and debris waste would represent approximately 0.001 percent of the Azusa Land Reclamation Landfill's existing remaining disposal capacity of 50.77 million tons.<sup>282</sup>

Given the remaining permitted capacity the Azusa Land Reclamation facility, as well as the remaining capacity at the Class III landfills open to the City, the landfills serving the Project Site

<sup>280</sup> <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>

<sup>281</sup> Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

<sup>282</sup> (233 tons ÷ 50.77 million tons) \* 100 = 0.001 percent.

would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

It should be noted that soil export is not included in the calculation of construction waste since soil is not disposed of as waste but, rather, is typically used as a cover material or fill at other construction sites requiring soils import. As reported above, the Azusa Land Reclamation landfill, the County's inert waste landfill, would be able to accommodate waste from the Project's construction activities.

Based on the above, Project construction would not 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 and strategies identified in the ColWMP or by the City (refer to Response to Question No. 19(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction-related impacts on solid waste facilities would be less than significant, and no mitigation measures would be required.

### Operation

As shown on **Table 5.19-4**, the Project would generate a net total of approximately 199 tons per year of solid waste. While this estimate accounts for recycling and other waste diversion measures consistent with the Citywide diversion rate of 76.4 percent, it does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.<sup>283</sup>

**Table 5.19-4**  
**Estimated Solid Waste Generation**

Land Use	Size	Rates	Total (Tons per year)
<b>Proposed Project</b>			
Residential	327 units	2.23 tons / unit	730
Commercial	9,462 sf (38 employees)	2.98 tons / employee	113
<b>Proposed Total</b>			<b>843</b>
<b>Total Net Disposal (after 76.4% diversion)</b>			<b>199</b>

Note: 1 ton = 2,000 pounds.

Los Angeles Unified School District, 2022 Developer Fee Justification Study, March 2022, Table 14.

Residential solid waste factor (City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2) is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year).

Non-residential yearly solid waste generation factors from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002.

<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

Table: CAJA Environmental Services, October 2023.

<sup>283</sup> City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?\\_adf.ctrl-state=102i43tjdg\\_1&\\_afLoop=15884281038430535&\\_afWindowMode=0&\\_afWindowId=null#!%40%40%3F\\_afWindowId%3Dnull%26\\_afLoop%3D15884281038430535%26\\_afWindowMode%3D0%26\\_adf.ctrl-state%3D102i43tjdg\\_5](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=102i43tjdg_1&_afLoop=15884281038430535&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D15884281038430535%26_afWindowMode%3D0%26_adf.ctrl-state%3D102i43tjdg_5), accessed October 5, 2023.

Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025, 95% by 2035, and zero waste by 2030.<sup>284</sup>

The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.<sup>285</sup>

Based on the above, the landfills that serve the Project Site have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, no Project impacts related to solid waste would occur and the Project would adequately be served by existing facilities.

The Project's estimated annual net increase of 199 tons represents approximately 0.0002 percent of the remaining capacity (71.3 million tons) for the County's Class III landfills open to the City.<sup>286</sup> The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of those landfills. As such, Project operation would not 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 or strategies identified in the CoIWMP or by the City (refer to Response to Question No. 19(e) regarding consistency with City solid waste planning goals). Therefore, the Project's potential construction impacts to solid waste facilities would be less than significant, and no mitigation measures would be required.

Furthermore, as described in the 2022 Annual Report, the County will continue to address landfill capacity through the preparation of CoIWMP annual reports. The preparation of each annual report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Solid waste disposal is an essential public service that must be provided without interruption in order to protect public health and safety, as well as the environment. Jurisdictions in the County of Los Angeles continue to implement and enhance the waste reduction, recycling, special waste, and public education programs identified in their respective planning directives. These efforts, together with countywide and regional programs implemented by the County and the cities, acting in concert or independently, have achieved significant, measurable results, as documented in the 2022 Annual Report.

Overall, based on the above, construction and operation of the Project would not 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. Thus, impacts would be less than significant.

<sup>284</sup> The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan, and City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn 2019. [https://plan.lamayor.org/sites/default/files/pLAn\\_2019\\_final.pdf](https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf), accessed October 5, 2023.

<sup>285</sup>  $(216 \text{ tons per year} / 71.3 \text{ million tons per year}) \times 100 = \sim 0.0002\%$

<sup>286</sup>  $199 \text{ tons per year} / 71.3 \text{ million tons} \times 100 = 0.0002 \text{ percent}$

## Cumulative Impacts

**Less Than Significant Impact.** Given the level of urbanization present throughout the Project vicinity, it is anticipated that other projects would similarly represent a minor percentage of the remaining capacity of the County’s Class III landfills open to the City. The demand for landfill capacity is continually evaluated by the County through preparation of the ColWMP annual reports. Each annual ColWMP report assesses future landfill disposal needs over a 15-year planning horizon. Based on the 2022 ColWMP, the County anticipates that future disposal needs can be adequately met for the next 15 years (i.e., 2035) with implementation of strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail. The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity.

As such, the Project’s contribution during operation would not be cumulatively considerable, and cumulative impacts with regard to solid waste disposal capacity from operations would be less than significant.

**e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**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, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate 4 cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste<sup>287</sup> on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

<sup>287</sup> Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.<sup>288</sup> The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Additionally, the Project's construction contractor would deliver all construction and demolition waste generated by the Project to a Certified Construction and Demolition Waste Processing Facility in accordance with City Ordinance No. 181,519. Furthermore, the Project would implement a construction waste management plan to divert a minimum of 75 percent waste from landfills, thus exceeding state requirements. As such, the Project would promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, Source Reduction and Recycling Element, Solid Waste Management Policy Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAN/L.A.'s Green New Deal.

Overall, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Thus, impacts would be less than significant.

### **Cumulative Impacts**

**Less Than Significant Impact.** Like the Project, the Related Projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each Related Project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. Specifically, the Project and Related Projects would be required to promote source reduction and recycling, consistent with AB 939 and the City's Solid Waste Integrated Resources Plan, General Plan Framework Element, RENEW LA Plan, Green LA Plan, and Sustainable City pLAN/L.A.'s Green New Deal.

Therefore, construction and operation of the Project and the Related Projects would comply with applicable state or City solid waste regulations and would not result in significant cumulative impacts. As such, the Project's contribution during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.

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288 Ordinance No. 171,687, adopted by the Los Angeles City Council on August 6, 1997.

## 1.20 Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

### SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

**PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition.
- b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place.
- c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary.

- d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses.
- e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place
- g) Include external sprinklers with an independent water source to reduce flammability of structures.
- h) Include local solar power paired with batteries to reduce power flow in electricity lines.
- i) For developments in high fire-prone areas, have a fire protection plan for residents and businesses.
- j) Provide fire hazard and fire safety education for homeowners in or near fire hazard areas.
- k) Developments in fire-prone areas should have fire-resistant feature, such as:
  - Ember-resistant vents
  - Fire-resistant roofs
  - Surrounding defensible space
  - Proper maintenance and upkeep of structures and surrounding area

### ***Applicability to the Project***

As described in the impact analysis below, the Project Site is not located in an area classified as a VHFHSZ. As such, the Project would not result in potential impacts pertaining to wildfire hazards, and the measures included in **PMM WF-1** are not applicable to the Project.

**PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:

- Submit a fire protection plan including the designation of fire watch staff;
- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities;
- Locate construction and maintenance equipment in designated “safe areas” such that they do not discharge combustible materials; and
- Designate trained fire watch staff during project construction to reduce risk of fire hazards.

### ***Applicability to the Project***

As previously discussed, the Project Site is not located in an area classified as a VHFHSZ. Thus, **PMM WF-2** are not applicable to the Project.

### **Impact Analysis**

- a) **Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b) **Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
- c) **Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d) **Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact (a-d).** The Project Site is located in an urbanized area, and there are no wildlands located in the vicinity of the Project Site. The Project is not located near state responsibility areas. The Project Site is not located within a City-designated VHFHSZ<sup>289</sup> or Wildfire Severity Zone.<sup>290</sup> Therefore, these thresholds would not apply to the Project. No impacts regarding wildfire risks would occur, and no mitigation measures are required.

289 City of Los Angeles Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APN 5406-016-028.

290 City of Los Angeles 2018 Local Hazard Mitigation Plan, January 2018, Figure 13-3, Wildfire Severity Zones in the East Los Angeles APC, p. 13-6. [https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018\\_LA\\_HMP\\_Final\\_with\\_maps\\_2018-02-09.pdf](https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf), accessed October 5, 2023.

## Cumulative Impacts

**Less Than Significant Impact.** There are nine Related Projects within 0.5 mile of the Project Site. Similar to the Project, the Related Projects are located in highly urbanized areas and would not contain wildland features or be located adjacent to any wildland areas, except for Related Project No. 2, a medical facility located along Stadium Way in VHFHSZ. As with the Project, any related Projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards, including those required of properties within the VHFHSZ (Related Project No. 2).

Nevertheless, similar to the Project, all Related Projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. As such, the Project's contribution to cumulative impacts would not be cumulatively considerable and impacts would be less than significant.

## 1.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 type="checkbox"/>	<input checked="" 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.** Based on the analyses contained under Checklist Section 1 through Checklist Section 20 above, with adherence to regulatory compliance measures and implementation of project design features and mitigation measures, the Project would not have the potential to degrade the quality of the environment and would not result in any significant unavoidable impacts to the environment.

The Project Site is located within an urbanized area and is currently vacant. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that applies to the Project.

The Project Site does include ornamental trees and weeds that could support nests for migratory birds or other habitat for urban species. In compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, the Project would incorporate **Mitigation Measure MM-BIO-1** as well as RTP/SCS **Mitigation Measures PMM BIO-1(g)** and **PMM BIO-1(i)** from the 2020–

2045 RTP/SCS PEIR MMRP, which would ensure that the Project would not 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 by the CDFW or USFWS. Thus, the Project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project would also implement **Project Design Feature PDF-BIO-1** to ensure potential construction-related impacts to the adjacent street trees would not occur.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed under Checklist Section 5, Cultural Resources, Checklist Section 7, Geology and Soils, and Checklist Section 18, Tribal Cultural Resources, with implementation of the City’s Conditions of Approval and **Mitigation Measure MM-TCR-1** regarding the potential inadvertent discovery of archaeological, paleontological, and tribal cultural resources, impacts to archeological resources, paleontological resources, and tribal cultural resources would be less than significant. Thus, overall, no evidence is presented that the Project would degrade the quality of the environment.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**Less Than Significant Impact.** The cumulative analysis in this SCEA takes into consideration the nine Related Projects listed in **Table 5.21-1** and shown in **Figure 5.21-1**.

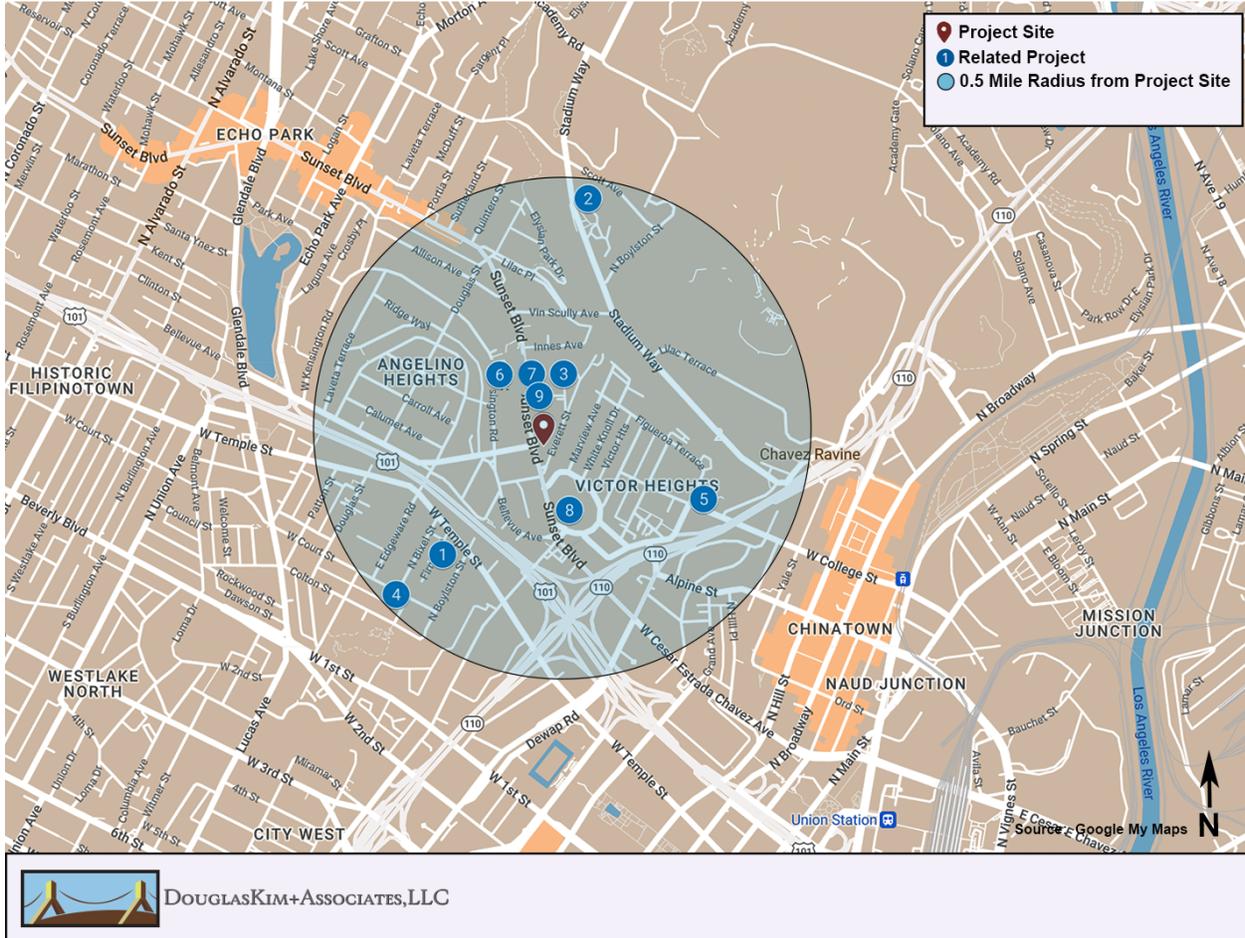
**Table 5.21-1  
Related Projects Within 0.5 Miles of Project Site**

#	Address	Distance from Project Site	Use	Size	Status
1	418 Firmin Street	1,450 feet southwest	Apartments	64 units	Completed in 2022.
2	2000 Stadium Way	2,050 feet north	Medical	80,545 sf	To be constructed.
3	1013 Everett Street	150 feet north	Apartments	49 units	Framed as of 2023.
4	1246 Court Street	2,225 feet southwest	Apartments	54 units	Completed in 2021.
5	765 College Street	1,775 feet east	Medical	100,000 sf 62 beds	To be constructed.
6	1274 Sunset Blvd	240 feet northwest	Hotel Restaurant	8 rooms 1,470 sf	To be constructed.
7	1275 Sunset Blvd	260 feet north	Apartments	77 units	To be constructed.
8	1111 Sunset Blvd	275 feet south	Apartment Hotel Office Commercial	737 units 180 rooms 48,000 sf 95,000	To be constructed.
9	1251 Sunset Blvd	5 feet north	Apartment	74 units	To be constructed.

**Table 5.21-1  
Related Projects Within 0.5 Miles of Project Site**

Source: Related Projects List, Related Projects Summary from Case Logging and Tracking System Los Angeles Department of Transportation, February 3, 2023 and internal team research. Transportation Assessment, Fehr & Peers, October 2023.

**Figure 5-21-1  
Location of Related Projects**



The list of Related Projects is based on information provided by LADOT in February 2023, and other recent studies, and include developments within a 0.5-mile radius of the Project Site, as suggested in the Transportation Assessment Guidelines.<sup>291</sup> Although these Related Projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. A significant impact may occur if the Project, in conjunction with the nine Related Projects, would result in impacts that would be significant when viewed together, even if impacts would otherwise not be considered significant when projects are analyzed on an individual basis.

The cumulative analyses for each environmental issue addressed above area are contained under Checklist Section 1 through Checklist Section 20 following the assessments of Project

<sup>291</sup> LADOT, Transportation Assessment Guidelines, page 2-3.

impacts. Based on these analyses, cumulative impacts related to all of the above environmental factors would be less than significant and the Project's contribution to cumulative impacts would not be cumulatively considerable.

**c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

**Less Than Significant with Mitigation Incorporated.** Based on the analyses contained under Checklist Section 1 through Checklist Section 20 above, the Project could result in potentially significant impacts with regard to Biological Resources, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. However, as outlined above, all of these potentially significant impacts would be reduced to less than significant levels. Therefore, the Project would not have significant environmental effects on human beings, either directly or indirectly.

# Section 6

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## Mitigation Monitoring Program

### 1 Introduction

This Mitigation Monitoring Program (MMP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A SCEA has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the SCEA takes into consideration the project design features (PDFs) and incorporates all feasible mitigation measures from all Program Environmental Impact Reports (PEIRs) applicable to the Project Site, and applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

### 2 Organization

As shown on the following pages, each identified project design feature and mitigation measure for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: the agency with the power to enforce the PDF or MM.
- Monitoring Agency: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Monitoring Phase: the phase of the Project during which the PDF or MM shall be monitored.
- Monitoring Frequency: the frequency at which the PDF or MM shall be monitored.
- Action Indicating Compliance: the action by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

### **3 Administrative Procedures and Enforcement**

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs and PDFs within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

### **4 Program Modification**

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the PDFs or MMs.

Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or the other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also

finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

## 5 Mitigation Monitoring Program

### 5.1 Air Quality

#### Project Design Feature

##### PDF-AIR-1: Tier 4 Construction Equipment

Construction equipment operating at the Project Site shall be subject to the requirements listed below.

- 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.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety, City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction, construction
- **Monitoring Frequency:** Once during plan check; Periodic field inspections
- **Action Indicating Compliance:** Plan check approval; Field inspection sign-off

## 5.2 Biological Resources

### Project Mitigation Measures

**MM-BIO-1:** The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.
- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.
- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; California Department of Fish and Wildlife
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-off

### RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction

- **Monitoring Frequency:** Once, prior to issuance of grading permits
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

#### **RTP/SCS Mitigation Measure PMM BIO-1(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.

- **Enforcement Agency:** California Department of Fish and Wildlife; Los Angeles Department of Building and Safety
- **Monitoring Agency:** Los Angeles Department of City Planning
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Once, prior to issuance of grading permits; or, if vegetation removal, building demolition, or grading is initiated during the nesting season, as determined by a qualified biologist (provide proof of compliance)
- **Action(s) Indicating Compliance:** Issuance of applicable building permit

#### **Project Design Feature**

##### **PDF-BIO-1: Street Tree Protection**

The Project Applicant/contractor shall install tree protection fencing around the seven Mexican fan palms on Sunset Boulevard to be protected. The Project Arborist shall be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures. The fencing shall be maintained throughout the grading and construction phase, and shall not be removed until the completion and cessation of all construction activities.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction, grading, construction
- **Monitoring Frequency:** Periodic field inspections

- **Action Indicating Compliance:** Field inspection sign-off

## 5.3 Hazards and Hazardous Materials

### Project Mitigation Measure

#### MM-HAZ-1: Soil Management Plan

A Soil Management Plan (SMP) will be developed and implemented to ensure any on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility, and that any previously unidentified subsurface features discovered during ground-disturbing activities be handled and disposed of in compliance with all applicable regulatory requirements. The SMP shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

## 5.4 Noise

### Project Mitigation Measures

**MM-NOI-1:** Construction staging shall be located as far from sensitive receptors as possible.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection

- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

**MM-NOI-2:** Temporary sound barriers capable of attenuating construction noise (e.g., construction sound barrier with sound blankets) and blocking the line-of-sight between the adjacent sensitive receptors shall be installed. Such barriers shall be capable of reducing sound pressure by at least 2.4 dBA  $L_{eq}$  at 1190 Sunset Boulevard; 4.3 dBA  $L_{eq}$  at 1251-1255 Sunset Boulevard; 1.8 dBA  $L_{eq}$  at off-site receptors to the west across Sunset Boulevard; and 11.0 dBA  $L_{eq}$  at off-site receptors at 906-924 Everett Street.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

**MM-NOI-3:** All powered construction equipment shall be equipped with advanced exhaust mufflers or other noise reduction devices.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

## 5.5 Public Services - Police Protection

### Project Design Features

**PDF-POL-1:** During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodically during field inspection
- **Action(s) Indicating Compliance:** Field inspection sign-off

**PDF-POL-2:** The Project will include a closed-circuit camera system and secure entry for the residential uses and resident parking areas.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; post-construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF-POL-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between subterranean parking areas and points of entry into the building.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF-POL-4:** The Project will provide sufficient lighting of the subterranean parking areas to maximize visibility and reduce areas of concealment.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF-POL-5:** The Project will design entrances to, and exits from, the building and open space areas to be open and in view of surrounding areas.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; construction
- **Monitoring Frequency:** Once at Project plan check; once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**PDF-POL-6:** Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** City of Los Angeles Police Department or City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Completion of construction
- **Monitoring Frequency:** Once prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Issuance of Certificate of Occupancy

## 5.6 Transportation

### Project Design Features

**PDF-TRAN-1:** Pursuant to City’s requirements, prior to the start of construction, a Construction Management Plan shall be prepared and submitted to LADOT for review and approval. The Construction Management Plan will formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan will include, but not be limited to, the following measures, as appropriate:

- To accommodate Project construction, closure of the northbound parking/PM peak hour bus lane on Sunset Boulevard along the Project frontage is anticipated between 6:30 AM and 4:00 PM, so as not to interfere with PM peak hour buses or the Dodger Stadium Express bus route during home games. During construction of the Project, a pedestrian canopy will be constructed to maintain access to the sidewalk, bus stop, and crosswalks at Marion Avenue.
- The existing land uses near the vicinity of the Project Site will remain open throughout construction. Pedestrian and vehicular access to properties located adjacent and near to the Project Site would remain open and unobstructed for the duration of construction. No loss of ADA pedestrian access to transit stops, stations, or facilities is anticipated. On-street parking on the Project frontage along Sunset Boulevard and Everett Street will be restricted during the construction period.
- Staging and parking areas during construction would initially be located at an off-site location to be determined at a future date. No staging and worker parking would occur on public streets and rights-of-way.
- Workers would park in the Project’s subterranean parking garage after it is constructed.
- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;

- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers ;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours to the extent feasible;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading or building permit; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

#### **PDF-TRAN-2: Transportation Demand Management (TDM) Measures:**

Although the Project is not expected to cause any significant transportation impact or non-CEQA operational issues in accordance with the TAG, the Project proposes the following TDM measures to reduce trips, traffic, VMT, and greenhouse gas emissions (GHGs):

- Reduced parking supply (263 spaces) compared to Los Angeles Municipal Code (LAMC) baseline requirements (621 spaces), in accordance with AB 2097.
- Unbundled cost of parking from residential leases.

- Promotions and marketing program (kiosk, coordinator, pamphlets, website) to inform travelers about different transportation options and the effects of their travel choices.
- Bicycle parking per LAMC.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction, Pre-operation
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading or building permit; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off; Certification of occupancy.

**PDF-TRAN-3: Modification of Sunset Boulevard and Marion Avenue intersection (Project driveway):**

- The Project proposes a full-access driveway to form the fourth leg of the Sunset Boulevard and Marion Avenue signalized intersection. This would involve the modification of traffic signal equipment, curbs, ramps, and striping at this intersection.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of grading or building permit; Once during field inspection
- **Action(s) Indicating Compliance:** Plan check approval and issuance of grading permit; Field inspection sign-off

## 5.7 Tribal Cultural Resources

### Project Mitigation Measure

**MM-TCR-1: Inadvertent Discovery Of Tribal Cultural Resources**

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.
- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- **Enforcement Agency:** City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; monitoring to be determined by tribal consultant and/or qualified archaeologist
- **Action(s) Indicating Compliance:** Submittal of a letter of retention demonstrating the qualifications to the Project proponent; If discoveries are found, submittal of compliance documentation by tribal consultant and/or qualified archaeologist. Submittal of a copy of the training materials and a list of attendees no more than 10 days after completing the training.