



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

Sustainable Communities Environmental Assessment

DTLA South Park Properties Sites 2 and 3 Project

CEQA Case Number: ENV-2018-2601-SCEA

Site 2: CPC-2018-2600-MCUP-ZV-TDR-DD-SPR; VTT-82109

Site 3: CPC-2018-2599-TDR-MCUP-ZV-DD-SPR; VTT-82141

Project Location: Site 2: 1105-1123 S. Olive Street, Los Angeles, CA 90015
Site 3: 1100-1130 S. Olive Street and 218-228 W. 11th Street, Los Angeles, CA 90015

Community Plan Area: Central City Community Plan Area

Council District: 14

Project Description:

The proposed development consists of two separate mixed-use buildings on two development sites separated by Olive Street in Downtown Los Angeles, known as DTLA South Park Properties Sites 2 and 3 Project (Project). Site 2 is located at 1105-1123 S. Olive Street at the southwest corner of Olive Street and 11th Street, and Site 3 is located at 1100-1130 S. Olive Street and 218-228 W. 11th Street at the southeast corner of Olive Street and 11th Street (Project Site).

Site 2 Development

The proposed development at Site 2 includes the demolition of an existing surface parking lot; removal of one (1) street tree on Olive Street and replacement with six (6) new London plane trees; removal of two (2) street trees on 11th Street and replacement with two (2) Chinese flame trees; export of approximately 118,543 cubic yards of earth; and construction, use, and maintenance of a 51-story mixed-use building containing 536 dwelling units and 4,178 square feet of ground floor commercial space. The Site 2 Development would include a total floor area of 491,515 square feet with a floor area ratio (FAR) of 9.13:1. The building would be a maximum of 603 feet in height as measured from grade to the top of the roof structure. The Site 2 Development would provide 581 automobile parking spaces for residential use in six (6) levels of subterranean parking and four (4) levels of above-grade parking podium. A total of 234 bicycle parking spaces, including 23 short-term and 211 long-term spaces, would be provided. The Site 2 Development would provide a minimum of 58,275 square feet of usable open space. To enable

the Site 2 Development, the Applicant is seeking a variance for parking dimensions, a Transfer of Floor Area Rights to permit the proposed FAR; a Director’s Decision regarding on-site trees; and a Vesting Tentative Tract Map, Site Plan Review, and a Main Conditional Use Permit for alcohol sales.

Site 3 Development

The proposed development at Site 3 includes the demolition of an existing surface parking lot; removal of four (4) street trees on Olive Street and replacement with six (6) new London plane trees; removal of three (3) street trees on 11th Street and replacement with three (3) Chinese flame trees; export of approximately 156,232 cubic yards of earth; and construction, use, and maintenance of a 60-story mixed-use building containing 713 dwelling units and 11,277 square feet of ground floor commercial space. The Site 3 Development would include a total floor area of 608,977 square feet with an FAR of 9:1. The building would be a maximum of 698 feet in height as measured from grade to the top of the roof structure. The Site 3 Development would provide 764 automobile parking spaces for residential use in six (6) levels of subterranean parking and four (4) levels of above-grade parking podium. A total of 290 bicycle parking spaces, including 31 short-term and 259 long-term spaces, would be provided. The Site 3 Development would provide a minimum of 75,425 square feet of usable open space. To enable the Site 3 Development, the Applicant is seeking a variance for parking dimensions, a Transfer of Floor Area Rights to permit the proposed FAR; a Director’s Decision regarding on-site trees; and a Vesting Tentative Tract Map, Site Plan Review, and a Main Conditional Use Permit for alcohol sales.

Public Review: A 30-day review period will begin on May 9, 2024, and end on June 10, 2024. Any interested person or agency may comment on this matter by submitting comments to the attention of Sophia Kim via email at sophia.kim@lacity.org or by mail to 200 N. Spring Street, Room 621, Los Angeles, CA 90012.

APPLICANTS:
MREG 1105 Olive, LLC (Site 2)
DTLA South Park Properties
Propco II, LLC (Site 3)

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ON BEHALF OF:
City of Los Angeles
Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

MAY 2024

DTLA South Park Properties Project Sites 2 and 3 Sustainable Communities Environmental Assessment

PREPARED FOR:

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MAY 2024

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1.0 INTRODUCTION

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

1.1 PROJECT INFORMATION

Project Title: DTLA South Park Properties Sites 2 and 3 Project

Project Location: The Project is located at the following addresses:

Site 2 – 1105-1123 S. Olive Street, Los Angeles, CA 90015

Site 3 – 1100-1130 S. Olive Street and 218-228 W. 11th Street, Los Angeles, CA 90015

Project Applicants: MREG 1105 Olive, LLC (Site 2)
1150 S. Olive Street, Suite 2250
Los Angeles, CA 90015

DTLA South Park Properties Propco II, LLC (Site 3)
1150 S. Olive Street, Suite 2250
Los Angeles, CA 90015

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 621
Los Angeles, CA 90012

Contact Person: Sophia Kim, City Planner
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1.2 PROJECT SUMMARY

The subject of this SCEA is the proposed DTLA South Properties Site 2 and 3 Project, consisting of two separate mixed-use buildings on two sites separated by Olive Street in Downtown Los Angeles (Project). Site 2 is located at 1105-1123 S. Olive Street at the southwest corner of Olive Street and 11th Street, and Site 3 is located at 1100-1130 S. Olive Street and 218-228 W. 11th Street at the southeast corner of Olive Street and 11th Street (Project Site). While evaluated as one project in one document for the purposes of CEQA, the Applicants have filed separate applications for each site and the City may consider the approval actions separately. The Project is discussed in further detail in **Section 2.0: Project Description**.

Site 2 Development

The Site 2 Development includes the demolition of an existing surface parking lot; removal of one (1) non-protected street tree on Olive Street and two (2) non-protected street trees on 11th Street, and replacement with six (6) new street trees; on Olive Street and two (2) new street trees on 11th Street; export of approximately 118,543 cubic yards of earth; and construction, use, and maintenance of a 51-story mixed-use building containing 536 dwelling units and 4,178 square feet of ground floor commercial space. The Site 2 Development would include a total floor area of 491,515 square feet with a floor area ratio (FAR) of 9.13:1. The building would be a maximum of 603 feet in height as measured from grade to the top of the roof structure. The Site 2 Development would provide 581 automobile parking spaces for the residential units in six (6) levels of subterranean parking and four (4) levels of above-grade parking podium. A total of 234 bicycle parking spaces, including 23 short-term and 211 long-term spaces, would be provided. The Site 2 Development would provide a minimum of 58,275 square feet of usable open space.

The discretionary entitlements, reviews, permits, and approvals required to implement the Site 2 Development include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages at a maximum of four establishments, including two (2) on-site sales and consumption and two (2) off-site sales;
- Pursuant to LAMC Section 12.27, a Zone Variance for reduced parking stall size to allow 8 feet, 6 inches by 16 feet in lieu of 9 feet, 4 inches by 18 feet, and reduced drive aisle width of a minimum 25 feet, 1 inch in lieu of 27 feet, 4 inches, as otherwise required by LAMC Section 12.21 A.5;
- Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.7, a Transfer of Floor Area Rights from the Los Angeles Convention Center (Donor Site) for the transfer of 274,795 square feet of floor area to the Site 2 (Receiver Site) permitting a maximum FAR of 9.13:1 in lieu of the maximum permitted FAR of 6:1;
- Pursuant to LAMC Section 12.21 G.3, a Director's Decision to provide 115 trees on-site in lieu of 134 trees as otherwise required;
- Pursuant to LAMC Section 16.05 C.1, a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units;
- Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82109 for the merger and re-subdivision of five (5) lots into a 19-lot subdivision consisting of 536 residential condominium units and 10 commercial condominium units; haul route for the export of 118,543 cubic yards of earth material; vacation of a portion of the airspace above an alley abutting the site to the northwest; and

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

Site 3 Development

The Site 3 Development includes the demolition of an existing surface parking lot; removal of four (4) non-protected street trees on Olive Street and three (3) non-protected street trees on 11th Street and replacement with six (6) new street trees on Olive Street and three (3) new street trees on 11th Street; export of approximately 156,232 cubic yards of earth; and construction, use, and maintenance of a 60-story mixed-use building containing 713 dwelling units and 11,277 square feet of ground floor commercial space. The Site 3 Development would include a total floor area of 608,977 square feet with an FAR of 9:1. The building would be a maximum of 698 feet in height as measured from grade to the top of the roof structure. The Site 3 Development would provide 764 automobile parking spaces for residential use in six (6) levels of subterranean parking and four (4) levels of above-grade parking podium. A total of 290 bicycle parking spaces, including 31 short-term and 259 long-term spaces, would be provided. The Site 3 Development would provide a minimum of 75,425 square feet of usable open space.

The discretionary entitlements, reviews, permits, and approvals required to implement the Site 3 Development include, but are not necessarily limited to, the following:

- Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.7, a Transfer of Floor Area Rights from the Los Angeles Convention Center (Donor Site) for the transfer of 328,135 square feet of floor area to Site 3 (Receiver Site) permitting a maximum FAR of 9:1 in lieu of the maximum permitted FAR of 6:1;
- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages at a maximum of six establishments including three (3) on-site sales and consumption and three (3) off-site sales;
- Pursuant to LAMC Section 12.27, a Zone Variance for reduced parking stall size to allow 8 feet, 6 inches by 16 feet in lieu of 9 feet, 4 inches by 18 feet, and reduced drive aisle width of a minimum 25 feet, 1 inch in lieu of 27 feet, 4 inches, as otherwise required by LAMC Section 12.21 A.5;
- Pursuant to LAMC Section 12.21 G.3, a Director's Decision to provide 128 trees on-site in lieu of 178 trees as otherwise required;
- Pursuant to LAMC Section 16.05 C.1, a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units;
- Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82141 for the merger and re-subdivision of six (6) lots into a 17-lot subdivision consisting of 713

residential condominium units and 10 commercial condominium units; haul route for the export of 156,232 cubic yards of earth material; and

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

1.3 BACKGROUND INFORMATION

Senate Bill 375

Senate Bill 375 (SB 375), also known as “The Sustainable Communities and Climate Protection Act of 2008,” outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California’s greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State’s 18 metropolitan planning organizations (MPO) to incorporate a “sustainable communities strategy” (SCS) into the regional transportation plans to achieve their respective region’s GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA. The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On September 3, 2020, SCAG’s Regional Council unanimously voted to approve and fully adopt *Connect SoCal 2020–2045 Regional Transportation Plan (RTP) / Sustainable Communities Strategy (SCS)*. *Connect SoCal* is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, planning strategies, and the people whose collaboration can improve the quality of life for Southern Californians. By Executive Order G-20-239, approved October 30, 2020, CARB officially determined that the *Connect SoCal 2020; 2045 RTP/SCS* prepared by SCAG would achieve the applicable GHG emissions reduction target for automobiles and light trucks of 19 percent per capita reduction by 2035, relative to 2005 levels, as established by CARB for the region.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for “transit priority projects” (as described below) that are consistent with SCAG’s *Connect SoCal 2020; 2045 RTP/SCS*.

Transit Priority Project Criteria

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

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in SCAG's *Connect SoCal 2020–2045 RTP/SCS*;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is defined 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 frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor is defined as an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

SCEA Process and Streamlining Provisions

A transit priority project may be approved using a SCEA if it has been determined to not result in significant and unavoidable environmental impacts. For a SCEA, an initial study shall be prepared to identify all potentially significant impacts.¹ As with an MND, mitigation must be identified for any potentially significant impacts. In addition, for a project to qualify to be evaluated through a SCEA, the project should incorporate all feasible mitigation measures, performance standards and criteria set forth in prior applicable EIRs.² This would include SCAG's *Connect SoCal: 2020, 2045 RTP/SCS Program EIR*.

A SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior EIRs; growth-inducing impacts are not required to be referenced, described or addressed; and project specific or cumulative impacts from cars and light duty truck trips on global warming or the regional transportation network need not be analyzed.³ The SCEA does not analyze alternatives to a project because like with an ND or MND, there are no significant impacts that need to be reduced or eliminated through project alternatives.

¹ Public Resource Code (PRC) §21155.2(b)(1).

² PRC §21155.2(a).

³ PRC §21159.28.

A draft of the SCEA will be circulated for public comment for a period of not less than 30 days with notice provided in the same manner as required for an environmental impact report.⁴ Prior to acting on the SCEA, the lead agency shall conduct a public hearing and shall review and consider all comments received.⁵

The specific substantive and procedural requirements for the approval of a SCEA include the following:

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

⁴ PRC §21155.2(b)(3).

⁵ PRC §21155.2(b)(5).

1.4 REQUIRED FINDINGS

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

1. The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the Project area in the *Connect SoCal: 2020–2045 RTP/SCS* prepared by SCAG;
2. The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG’s determination that the Sustainable Communities Strategy (SCS) adopted by SCAG in the *Connect SoCal: 2020–2045 RTP/SCS* would, if implemented, achieve the greenhouse gas emission reduction targets;
3. The Project qualifies as a transit priority project pursuant to PRC Section 21155(b);
4. The Project is a residential or mixed-use project as defined by PRC Section 21159.28(d);
5. The Project, as mitigated, incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports, including SCAG’s *Connect SoCal: 2020–2045 RTP/SCS Program EIR*;
6. All potentially significant or significant effects required to be identified and analyzed pursuant to the CEQA have been identified and analyzed in an initial study;
7. The Project, as mitigated, either avoids or mitigates to a level of insignificance all potentially significant or significant effects of the Project required to be analyzed pursuant to CEQA; and
8. An Initial Study has been prepared in accordance with CEQA (PRC 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).

Therefore, the City of Los Angeles finds that the Project complies with the requirements of CEQA by preparing a SCEA as authorized pursuant to Public Resource Code Section 21155.2(b).

1.5 ORGANIZATION OF THE SCEA

This SCEA is organized into six sections as follows:

Section 1.0: Introduction provides introductory information, such as the Project title, the Project Applicant, and the lead agency for the Project.

Section 2.0: Project Description provides a detailed description of the Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Section 3.0: Sustainable Communities Environmental Assessment Criteria describes the regulatory background and criteria for the use of a SCEA in completing the CEQA process for this Project.

Section 4.0: Incorporation of Mitigation Measures, Performance Standards, and Criteria from Prior Applicable EIRs identifies the mitigation measures contained in the Mitigation Monitoring and Reporting Program (MMRP) for SCAG's *Connect SoCal: 2020, 2045 RTP/SCS Program EIR* and a discussion of the applicability of the mitigation measures to the project.

Section 5.0: SCEA Initial Study Checklist contains the completed Initial Study Checklist as well as a summary of applicable project design features, mitigation measures, and regulatory compliance measures.

Section 6.0: Sustainable Communities Environmental Analysis identifies each environmental issue identified in the Initial Study Checklist which contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less-than-significant level.

In addition, **Appendices** include reports and data used to support the analysis in this SCEA.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The DTLA South Park Properties Sites 2 and 3 Project (Project) would occur on two separate development locations (Site 2 and Site 3) in the Central City Community Plan Area. The Project Site is north of the Santa Monica Freeway (I-10) and east of the Harbor Freeway (Interstate-110/State Route 110), as shown in **Figure 2-1: Regional Location Map**. Site 2, also referred to as the Site 2 Development, occupies the southwestern corner of the 11th Street and S. Olive Street intersection and Site 3, also referred to as the Site 3 Development, occupies the southeastern corner of the of the 11th Street and S. Olive Street intersection, as shown in **Figure 2-2: Project Location Map**. Together, Site 2 and Site 3 are referred to as the Project Site.

Site 2 consists of five parcels contained within three Assessor's Parcel Numbers (APNs):

1. APN 5139-020-025 consists of three parcels encompassing a 19,429.5-square foot area on the immediate southwest corner of 11th Street and S. Olive Street. The address associated with this APN is 1105 S. Olive Street.
2. APN 5139-020-007 consists of one parcel encompassing a 7,425.4-square foot area approaching mid-block on S. Olive Street. The addresses associated with this APN are 1115 and 1117 S. Olive Street.
3. APN 5139-020-006 consists of one parcel encompassing an 8,931.4-square foot area approaching mid-block on S. Olive Street. The addresses associated with this APN are 1119 and 1123 S. Olive Street.

Site 3 consists of six parcels contained within three APNs, as follows:

1. APN 5139-019-040 consists of four parcels encompassing a 31,499.8-square foot area on the immediate southeast corner of 11th Street and S. Olive Street. The addresses associated with this APN are 220, 222, 224, 226, and 228 W. 11th Street and 1100, 1114, 1118, and 1120 S. Olive Street.
2. APN 5139-019-015 consists of one parcel encompassing a 4,758.9-square foot area on the southeast corner of 11th Street and S. Olive Street. The address associated with this APN is 218 W. 11th Street.
3. APN 5139-019-011 consists of one parcel encompassing a 10,138.2-square foot area approaching mid-block on S. Olive Street. The addresses associated with this APN are 1124, 1126, 1128, and 1130 S. Olive Street.

2.2 EXISTING SITE CONDITIONS

The Project Site occupies a combined area of approximately 82,927 square feet; Site 2 is 36,120 gross square feet and Site 3 is 46,807 gross square feet. Both sites are currently used as surface

parking lots. The Project Site includes 10 non-protected street trees, including one street tree along Olive Street and two street trees along 11th Streets adjacent to the Site 2 and four street trees along Olive Street and three street trees adjacent to the Site 3. The Project Site is otherwise paved with impervious surfaces and does not contain any vegetation.

2.3 ZONING AND LAND USE

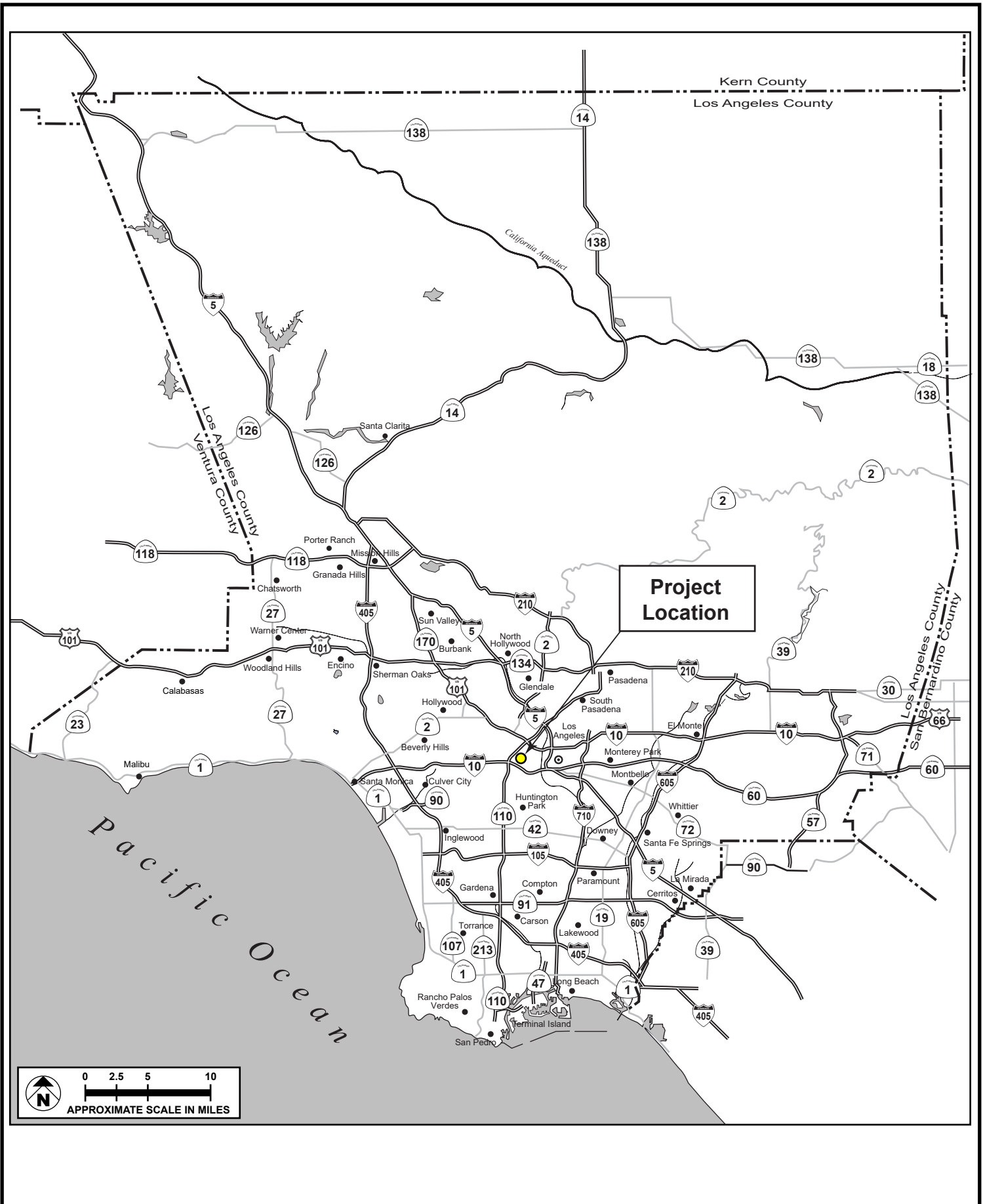
The Project Site is subject to the applicable land use and zoning requirements of the City of Los Angeles General Plan and the City of Los Angeles Municipal Code. The Project Site is located within the Central City Community Plan Area. **Figure 2-3: Community Plan Land Use Map** depicts the land use designations of the Project Site and the surrounding properties. The Community Plan Land Use Map designates the Project Site as Regional Center Commercial. Consistent with the Community Plan designation, the Project Site is zoned C2-4D-O. The C2 Commercial Zone permits a variety of uses, such as multi-family residential; retail with limited manufacturing; service stations and garages; and office uses, hotels, and hospitals. The Project Site is located in Height District No. 4, which permits a maximum floor area ratio (FAR) of 13:1, with no limitation for building height. The “D” limitation restricts the FAR to 6:1, except under circumstances, such as Transfer of Floor Area Rights approval, which is applicable to the Project. The “O” designation specifies the site’s location in an Oil Drilling supplemental use district. The Project Site is also within the City Center Redevelopment Project Area (ZI No.2488), a Transit Priority Area (ZI No. 2452), the Greater Downtown Housing Incentive Area (ZI No. 2385), a State Enterprise Zone (ZI No. 2374), and Central City and Downtown Parking Districts.

2.4 SURROUNDING LAND USES

The Project Site is located in the South Park District of Downtown Los Angeles, a highly urbanized area of Los Angeles. Land uses surrounding the Project Site include a mix of residential, retail, an office uses and a parking structure. Buildings range from low-rise to high-rise and are physically separated by secondary streets, a parking lot, or an alley.

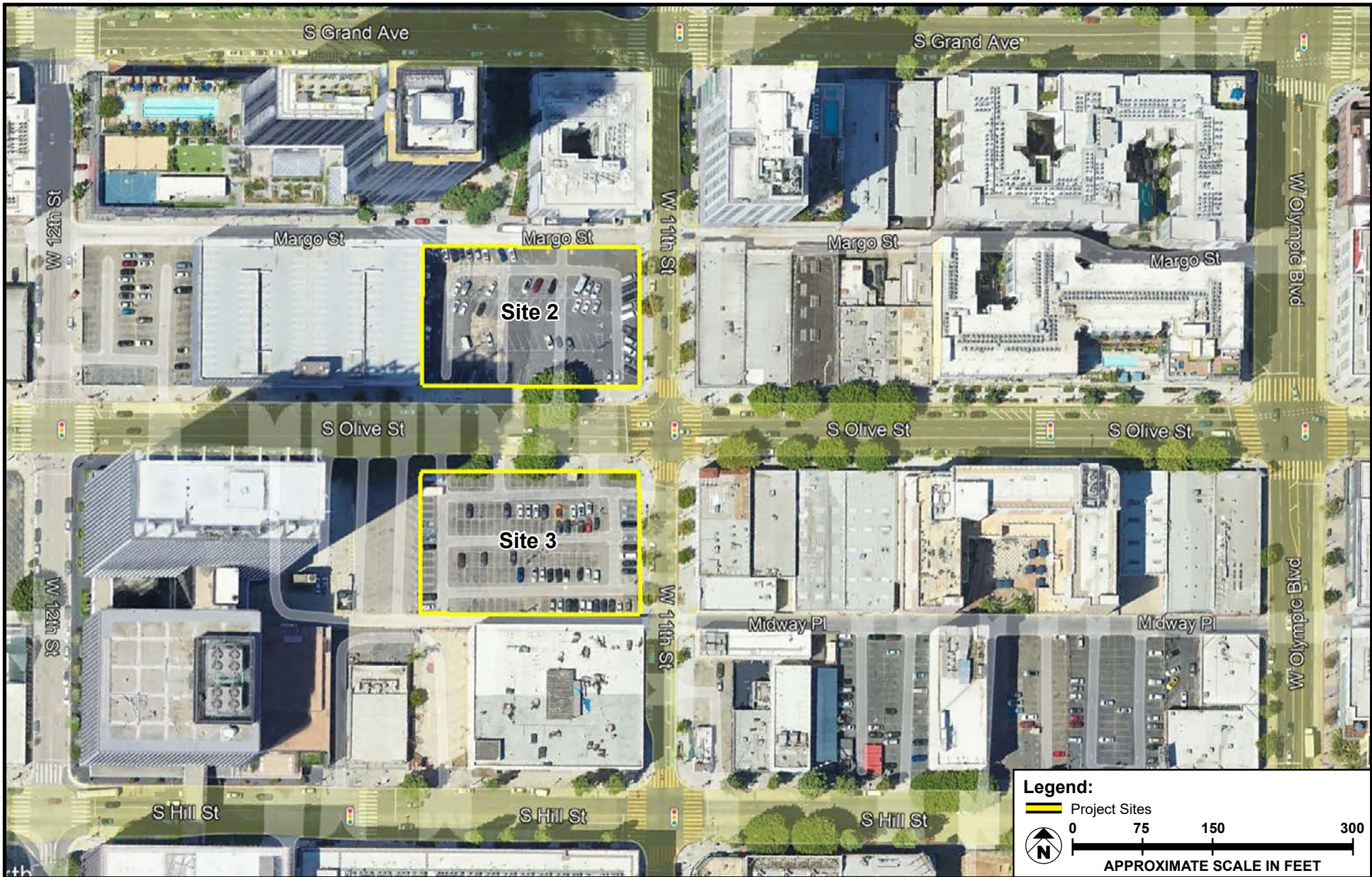
North: On the northwestern corner of 11th Street and S. Olive Street are one-story commercial buildings which comprise the 0.5-acre site of the planned Crescent Heights Development, a proposed 70-story residential tower. In addition, there is a two-story YMCA Los Angeles Job Corps building. Further northwest on the corner of 11th Street and S. Grand Avenue is the 25-story “Ten50” residential tower. Approximately 0.3 miles further northwest are the Crypto.com Arena (formerly Staples Center), L.A. LIVE entertainment complex, and Peacock (formerly Microsoft Theater) on S. Figueroa Street.

East: To the immediate east of the Project Site is a warehouse and across 11th Street are one- and two-story commercial buildings, including three two-story Los Angeles Job Corps buildings, two restaurants, and a hookah lounge, as well as a surface parking lot along S. Hill Street. Approximately 275 feet east of the site are the Belasco Theater and the Mayan Theater on S. Hill Street.



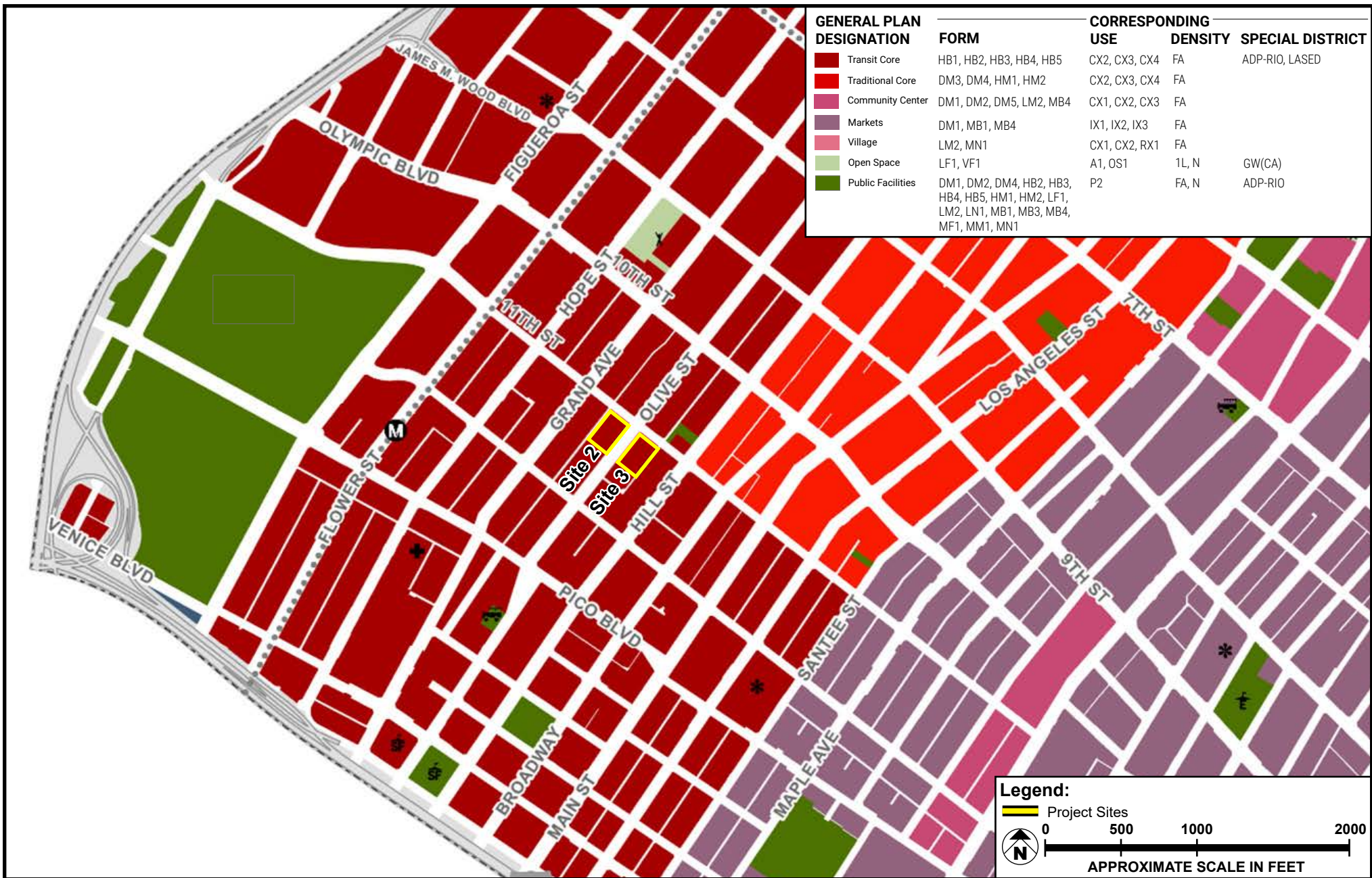
SOURCE: Google Earth - May 2023

FIGURE 2-1



SOURCE: Google Earth - 2023

FIGURE 2-2



SOURCE: LA City Planning Commission - September 2021

FIGURE 2-3

South: To the immediate south of the Project Site, on the same block are surface parking lots, a one-story bank, two high-rise office towers, including the USC Tower, a six-story public parking garage, and a planned 12-story residential midrise building. In addition, there is a warehouse building located on the caddy-corner to the Project Site, on the same block as a single-story Bank of America building.

West: To the immediate west of the Project Site are a seven-story residential midrise building, the 0.5-acre South Park Commons park, and a 38-story residential tower.

2.5 ACCESS AND CIRCULATION

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10) which runs in an east-west direction approximately 0.5 miles south of the Project Site, and the Harbor Freeway/State Route 110 (I-110/SR 110), which runs in a northeast-southwest direction 0.75 miles west of the Project Site. In addition, the Hollywood Freeway (US 101) is 1.5 miles southwest of the Project Site and the Santa Ana Freeway (I-5) is 2.4 miles west of the Project Site.

Local street access is provided by a grid roadway system encompassing the Project Site and surrounding area. 11th Street, which borders the north portion of the Project Site, is a Modified Collector Street that runs in a southeast-northwest direction. The existing surface parking lots are accessed through curb cuts on 11th Street and S. Olive Street as well as access points on Margo Street and other alleys. As part of the MyFigueroa Project,¹ 11th Street has been reconfigured with wider sidewalks and a reduction from two westbound travel lanes to one. S. Olive Street, which bisects Site 2 and Site 3, is a Modified Avenue II that runs in a southwest-northeast direction, with four northbound travel lanes. The northwestern side of Site 2 is bordered by Margo Street, an alley, and the southeastern side of Site 3 is bordered by an alley.² 11th Street features a Class III bike lane and S. Olive Street features a Class II bike lane.

The Project Site is well served by public transit on-street and in the vicinity through Los Angeles County Metropolitan Transportation Authority (Metro), LADOT's Downtown Area Shuttle (DASH), LADOT's Commuter Express (CE), Santa Monica Big Blue Bus, Foothill Transit, Orange County Transportation Authority (OCTA), Torrance Transit, Gardena Municipal Bus, Commerce Municipal Bus, and Montebello Transit. The Project Site is located in a transit priority area (ZI No. 2452), meaning it is within a one-half mile vicinity of a major transit stop. The closest major transit stop is Metro Pico Station, approximately 0.25 miles west of the Project Site, located at 1250 S. Flower Street on the northeastern corner of W. Pico Boulevard and S Flower Street. Metro Pico Station provides service to the Metro A (Blue) Line 801 and Metro E (Expo) Line 806. The Metro A Line

¹ The Figueroa Corridor Streetscape project (MyFigueroa) is an effort to transform the Figueroa Corridor into a complete, multimodal street to allow safer use by pedestrians, bicyclists, transit riders, and drivers alike. The project area extends from 7th Street Downtown to Martin Luther King Boulevard along Expo Park.

² City of Los Angeles. Department of Public Works, Bureau of Engineering. "NavigateLA." <https://navigatea.lacity.org/navigatea/>. Accessed February 2018.

includes major destinations such as Downtown Los Angeles, Florence, Watts, Compton, and Long Beach. The Metro E Line includes major destinations such as Downtown Los Angeles, Exposition Park, Jefferson Park, West Adams, Culver City, Century City, West Los Angeles, and Santa Monica.

The Metro Pico Station provides service to the 7th Street/Metro Center Station, a multimodal transit hub in Downtown Los Angeles approximately 0.75 miles northwest of the Project Site, where additional rail lines can be accessed. This includes the Metro B (Red) Line 802, which runs between North Hollywood and Downtown Los Angeles, and the Metro D (Purple) Line 805, which runs between Koreatown and Downtown Los Angeles.

The closest bus stop to the Project Site is the Olive/11th Bus Station (Stop ID: 5370), located in between Sites 2 and 3, where several local lines can be accessed. Additionally, the following bus lines provide service within 0.5 mile of the Project Site:

- Metro Local 2 – Route 2 is a local line that travels from Downtown Los Angeles to Pacific Palisades via Sunset Boulevard, with average headways of 11 to 27 minutes during the weekday morning and afternoon peak hours. It provides service to Hollywood, Beverly Hills, and Brentwood. This line travels along Hill Street and Broadway in the vicinity of the Project Site, with stops at Hill Street & 11th Street, Hill Street & 12th Street, Broadway & 11th Street, and Broadway & 12th Street.
- Metro Local 4 – Route 4 is a local line that travels from Downtown Los Angeles to West Los Angeles via Santa Monica Boulevard, with average headways of 10 to 14 minutes during the weekday morning and afternoon peak hours. It provides service to Dodger Stadium, Echo Park, and West Hollywood. This line travels along Hill Street and Broadway in the vicinity of the Project Site, with stops at Hill Street & 11th Street, Hill Street & 12th Street, Broadway & 11th Street, and Broadway & 12th Street.
- Metro Local 10 – Route 10 is a local line that travels from Downtown Los Angeles to West Hollywood via Temple Street and Melrose Avenue, with average headways of 11 to 12 minutes during the weekday morning and afternoon peak hours. It provides service to L.A. City College, Fairfax High School, and the Pacific Design Center. This line travels along Hill Street and Main Street in the vicinity of the Project Site with stops at Hill Street & 11th Street and Hill Street & 12th Street.
- Metro Local 14 – Route 14 is a local line that travels from Downtown Los Angeles to Beverly Hills via Beverly Boulevard, with average headways of eight minutes during the weekday morning and afternoon peak hours. It provides service to Larchmont Village, The Original Farmers Market and The Grove, and Cedars-Sinai Medical Center. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street and Olive Street & 11th Street.
- Metro Local 20 – Route 20 is a local line that travels from Downtown Los Angeles to Santa Monica via Wilshire Boulevard, with average headways of eight to 15 minutes during the

morning and afternoon peak hours. It provides service to Koreatown, Beverly Hills, and Westwood. This line travels along 7th Street in the vicinity of the Project Site, with stops at Hope Street & 7th Street and Olive Street & 7th Street.

- Metro Local 28 – Route 28 is a local line that travels from Downtown Los Angeles to Century City via W. Olympic Boulevard, with average headways of 13 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Koreatown, the Miracle Mile, and Beverly Hills. This line travels along Olympic Boulevard and Hill Street in the vicinity of the Project Site, with stops at Grand Avenue & Olympic Boulevard and Olive Street & Olympic Boulevard.
- Metro Local 30 – Route 30 is a local line that travels from West Hollywood to the Metro Gold Line Indiana Station, with average headways of eight minutes during the weekday morning and afternoon peak hours. It provides service to the Miracle Mile, Downtown Los Angeles, and Boyle Heights. This line travels along Pico Boulevard and Broadway in the vicinity of the Project Site, with a stop at Grand Avenue & Pico Boulevard.
- Metro Local 33 – Route 33 is a local line that travels from Downtown Los Angeles to Santa Monica via Venice Boulevard, with average headways of 10 to 20 minutes during the weekday morning and afternoon peak hours. It provides service to Mid-City, Culver City, and Venice. This line travels along Main Street in the vicinity of the Project Site, with stops at Main Street & 11th Street and Main Street & 12th Street.
- Metro Local 35 – Route 35 is a local line that travels from Downtown Los Angeles to the Washington/Fairfax Transit Hub via Washington Boulevard, with average headways of 12 to 22 minutes during the weekday morning and afternoon peak hours. It provides service to Arlington Heights and Mid-City. This line travels along Main Street in the vicinity of the Project Site, with a stop at Broadway & Venice Boulevard.
- Metro Local 37 – Route 37 is a local line that travels from Downtown Los Angeles to the Washington/Fairfax Transit Hub via Adams Boulevard, with average headways of eight minutes during the weekday morning and afternoon peak hours. It provides service to University of Southern California (USC), Jefferson Park, and West Adams. This line travels along Grand Avenue & Olive Street, with stops at Grand Avenue & 11th Street and Olive Street & 11th Street.
- Metro Local 38 – Route 38 is a local line that travels from Downtown Los Angeles to the Washington/Fairfax Transit Hub via Jefferson Boulevard, with average headways of 15 to 22 minutes during the weekday morning and afternoon peak hours. It provides service to Jefferson Park, West Adams, and Culver City. This line travels along Broadway in the vicinity of the Project Site, with a stop at Broadway & Venice Boulevard.
- Metro Local 40 – Route 40 is a local line that travels from Downtown Los Angeles to Redondo Beach via Martin Luther King Jr. Boulevard and Hawthorne Boulevard, with average headways of 12 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Leimert Park, Inglewood, and the Metro Green Line Hawthorne/Lennox

Station. This line travels along Broadway and Spring Street in the vicinity of the Project Site, with stops at Spring Street & 11th Street and Broadway & 12th Street.

- Metro Local 45 – Route 45 is a local line that travels from Lincoln Heights to Rosewood via Broadway, with average headways of eight to 10 minutes during the weekday morning and afternoon peak hours. It provides service to Downtown Los Angeles, South Los Angeles, and the Metro Green Line Harbor Freeway Station. This line travels along Broadway in the vicinity of the Project Site, with stops at Broadway & 11th Street and Broadway & 12th Street.
- Metro Local 48 – Route 48 is a local line that travels from Downtown Los Angeles to the Metro Green Line Avalon Station via Main Street and San Pedro Street, with average headways of 11 to 12 minutes during the weekday morning and afternoon peak hours. It provides service to South Los Angeles. This line travels along Main Street in the vicinity of the Project Site, with stops at Main Street & 11th Street and Main Street & 12th Street.
- Metro Local 51 – Route 51 is a local line that travels from Wilshire Center to Compton via Avalon Boulevard, with average headways of six minutes during the weekday morning and afternoon peak hours. It provides service to Downtown Los Angeles, the Metro Green Line Avalon Station, and the Martin Luther King Jr. Transit Center/Metro A (Blue) Line Compton Station. This line travels along 7th Street in the vicinity of the Project Site, with a stop at the 7th Street/Metro Center Station.
- Metro Local 52 – Route 52 is a local line that travels from Wilshire Center to the Harbor Gateway Transit Center via Avalon Boulevard during the off-peak hours. It provides service to Downtown Los Angeles, the Metro Green Line Avalon Station, and the Home Depot Center. This line travels along 7th Street in the vicinity of the Project Site, with a stop at the 7th Street/Metro Center Metro Station.
- Metro Local 55 – Route 55 is a local line that travels from Downtown Los Angeles to the Metro Willowbrook/Rosa Parks Station via Compton Avenue, with average headways of 10 to 20 minutes during the weekday morning and afternoon peak hours. It provides service to the Metro A (Blue) Line Grand Station, Firestone Station, and Watts. This line travels along Main Street in the vicinity of the Project Site, with stops at Main Street & 11th Street and Main Street & 12th Street.
- Metro Local 60 – Route 60 is a local line that travels from Downtown Los Angeles to the Metro A (Blue) Line Artesia Station via Pacific Boulevard/Long Beach Boulevard, with average headways of nine minutes during the weekday morning and afternoon peak hours. It provides service to Vernon, Lynwood, and the Metro Green Line Long Beach Boulevard Station. This line travels along 7th Street in the vicinity of the Project Site, with a stop at the Metro 7th Street/Metro Center Station.
- Metro Local 66 – Route 66 is a local line that travels from Wilshire Center to Montebello via 8th Street and Olympic Boulevard, with average headways of nine to 14 minutes during the weekday morning and afternoon peak hours. It provides service to Koreatown, Downtown Los Angeles, and East Los Angeles. This line travels along 8th Street and 9th Street in the vicinity

of the Project Site, with stops at Grand Avenue & 9th Street, Grand Avenue & 8th Street, Olive Street & 9th Street, and Grand Avenue & 8th Street.

- Metro Local 70 – Route 70 is a local line that travels from Downtown Los Angeles to El Monte via Garvey Avenue, with average headways of 11 to 13 minutes during the weekday morning and afternoon peak hours. It provides service to Boyle Heights, Monterey Park, and the Los Angeles County USC (LAC+USC) Medical Center. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street, Grand Avenue & 12th Street, Olive Street & 11th Street, and Olive Street & 12th Street.
- Metro Local 71 – Route 71 is a local line that travels from Downtown Los Angeles to California State University, Los Angeles (Cal State L.A.) via Wabash Avenue and City Terrace Drive, with average headways of 18 to 22 minutes during the weekday morning peak hours. Weekday afternoon peak hour information was not provided. It provides service to the LAC+USC Medical Center. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street and Olive Street & 12th Street.
- Metro Local 76 – Route 76 is a local line that travels from Downtown Los Angeles to El Monte via Valley Boulevard, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to Lincoln Heights, Alhambra, and Rosemead. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street Olive Street & 12th Street.
- Metro Local 78 – Route 78 is a local line that travels from Downtown Los Angeles to Arcadia via Las Tunas Drive/Huntington Drive, with average headways of eight to 12 minutes during the weekday morning and afternoon peak hours. It provides service to El Sereno, Alhambra, and South Arcadia. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street and Olive Street & 11th Street.
- Metro Local 79 – Route 79 is a local line that travels from Downtown Los Angeles to Arcadia via Las Tunas Drive/Huntington Drive, with average headways of eight to 12 minutes during the weekday morning and afternoon peak hours. It provides service to El Sereno, Alhambra, and South Arcadia. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street and Olive Street & 11th Street.
- Metro Local 81 – Route 81 is a local line that travels from Eagle Rock to the Metro Green Line Harbor Freeway Station via Figueroa Street, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to Highland Park, Downtown Los Angeles, and USC. This line travels along Figueroa Street in the vicinity of the Project Site, with stops at Flower Street & 11th Street and Figueroa Street & Olympic Boulevard.
- Metro Local 83 – Route 83 is a local line that travels from Downtown Los Angeles to Eagle Rock via York Boulevard, with average headways of 30 minutes during the weekday morning and afternoon peak hours. It provides service to Highland Park and Cypress Park. This line travels along Hill Street in the vicinity of the Project Site, with stops at Hill Street & 11th Street and Hill Street & 12th Street.

- Metro Local 84 – Route 84 is a local line that travels from Downtown Los Angeles to Eagle Rock via Eagle Rock Boulevard, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to Cypress Park and Glassell Park. This line travels along Hill Street and Broadway in the vicinity of the Project Site, with a stop at Hill Street & 7th Street.
- Metro Local 90/91 – Route 90 is a local line that travels from Downtown Los Angeles to Sunland via Glendale Avenue and Foothill Boulevard, with average headways of 17 to 22 minutes during the weekday morning and afternoon peak hours. It provides service to Chinatown, Glassell Park, and Glendale. This line travels along Hill Street in the vicinity of the Project Site, with stops at Hill Street & 11th Street and Hill Street & 12th Street.
- Metro Local 92 – Route 92 is a local line that travels from Downtown Los Angeles to the Burbank Station via Glendale Boulevard, Brand Boulevard, and Glenoaks Boulevard, with average headways of 20 minutes during the weekday morning and afternoon peak hours. It provides service to Echo Park and Glendale. This line travels along Spring Street and Main Street in the vicinity of the Project Site, with a stop at Main Street & 11th Street.
- Metro Local 94 – Route 94 is a local line that travels from Downtown Los Angeles to Sun Valley via San Fernando Road, with average headways of 20 to 27 minutes during the weekday morning and afternoon peak hours. It provides service to Chinatown, Glendale, and Burbank. This line travels along Hill Street in the vicinity of the Project Site, with stops at Hill Street & 11th Street and Hill Street & 12th Street.
- Metro Local 96 – Route 96 is a local line that travels from Downtown Los Angeles to the Burbank Station via Riverside Drive, with average headways of 30 to 34 during the weekday morning and afternoon peak hours. It provides service to Chinatown, Silver Lake, the Los Angeles Zoo, and Griffith Park. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & Pico Boulevard and Olive Street & 11th Street.
- Metro Limited 330 – Route 330 is a limited-service line that travels from Downtown Los Angeles to West Hollywood via Pico Boulevard and San Vicente Boulevard, with average headways of 27 to 34 minutes during the weekday morning and afternoon peak hours. It provides service to Mid-City, Beverly Hills, and Cedars-Sinai Medical Center. This line travels along Pico Boulevard and Broadway in the vicinity of the Project Site, with a stop at Grand Avenue & Pico Boulevard.
- Metro Limited 355 – Route 355 is a limited-service line that travels from Downtown Los Angeles to the Metro Willowbrook/Rosa Parks Station via Compton Avenue, with average headways of 20 minutes during the weekday morning peak hours and 60 minutes during the afternoon peak hours. It provides service to the Metro A (Blue) Line Grand Station, Firestone Station, and Watts. This line travels along Main Street in the vicinity of the Project Site, with stops at Main Street & 11th Street and Main Street & 12th Street.
- Metro Limited 378 – Route 378 is a limited-service line that travels from Downtown Los Angeles to Arcadia via Las Tunas Drive/Huntington Drive, with average headways of 30

minutes during the weekday morning and afternoon peak hours. It provides service to El Sereno, Alhambra, and South Arcadia. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 11th Street and Olive Street & 11th Street.

- Metro Express 442 – Route 442 is an express line that travels from Downtown Los Angeles to the Metro Green Line Hawthorne/Lennox Station via Manchester Boulevard, with average headways of 45 minutes during the weekday morning and afternoon peak hours. It provides service to USC, Inglewood, and Lennox. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Flower Street & 11th Street.
- Metro Express 460 – Route 460 is an express line that travels from Downtown Los Angeles to Disneyland via the Harbor Transitway and the Century Freeway (I-105), with average headways of 22 to 27 minutes during the weekday morning and afternoon peak hours. It provides service to Norwalk, La Mirada, and Knott’s Berry Farm. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Flower Street & 11th Street.
- Metro Express 487 – Route 487 is an express line that travels from Westlake/MacArthur Park to the El Monte Station, with average headways of 20 to 35 minutes during the weekday morning and afternoon peak hours. It provides service to Downtown Los Angeles, San Gabriel, Pasadena, and Arcadia. This line travels along Wilshire Boulevard in the vicinity of the Project Site, with stops at Figueroa Street & Wilshire Boulevard and Flower Street & Wilshire Boulevard.
- Metro Express 489 – Route 489 is an express line that travels from Westlake/MacArthur Park to Arcadia, with average headways of 25 minutes during the weekday morning and afternoon peak hours. It provides service to Downtown Los Angeles, San Gabriel, Rosemead, and Temple City. This line travels along Wilshire Boulevard in the vicinity of the Project Site, with stops at Figueroa Street & Wilshire Boulevard and Flower Street & Wilshire Boulevard.
- Metro Shuttle 603 – Route 603 is a local shuttle that travels from the Metro A (Blue) Line Grand Station to the Glendale Galleria via Hoover Street, Rampart Boulevard, and San Fernando Road, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Westlake/MacArthur Park, Echo Park, and the Glendale Metrolink Station. This line travels along Grand Avenue in the vicinity of the Project Site, with a stop at Grand Avenue & Washington Boulevard.
- Metro Rapid 728 – Route 728 is rapid line that travels from Downtown Los Angeles to Century City via Olympic Boulevard, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to Koreatown, the Miracle Mile, and Beverly Hills. This line travels along Olympic Boulevard in the vicinity of the Project Site, with stops at Hill Street & Olympic Boulevard and Broadway & Olympic Boulevard.
- Metro Rapid 733 – Route 733 is rapid line that travels from Downtown Los Angeles to Santa Monica via Venice Boulevard, with average headways of 10 to 20 minutes during the weekday

morning and afternoon peak hours. It provides service to Mid-City, Palms, and Venice, Culver City. This line travels along Venice Boulevard and Main Street in the vicinity of the Project Site, with a stop at Main Street & Olympic Boulevard.

- Metro Rapid 745 – Route 745 is rapid line that travels from Union Station to the Metro Green Line Harbor Freeway Station via Broadway, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It provides service to Downtown Los Angeles and South Los Angeles. This line travels along Broadway in the vicinity of the Project Site, with a stop at Broadway & 11th Street.
- Metro Rapid 760 – Route 760 is rapid line that travels from downtown Los Angeles to the Metro Green Line Long Beach Boulevard Station via Long Beach Boulevard, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to Vernon, Huntington Park, and South Gate. This line travels along 7th Street in the vicinity of the Project Site, with a stop at the Metro 7th Street/Metro Center Station.
- Metro Rapid 770 – Route 770 is rapid line that travels from Downtown Los Angeles to the El Monte Station via Cesar E. Chavez Avenue and Garvey Avenue, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to East Los Angeles, Monterey Park, and South El Monte. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & Olympic Boulevard and Olive Street & Olympic Boulevard.
- Metro Rapid 794 – Route 794 is rapid line that travels from Downtown Los Angeles to the Sylmar Station via San Fernando Road, with average headways of 20 to 30 minutes during the weekday morning and afternoon peak hours. It provides service to Glendale and Burbank. This line travels along Hill Street in the vicinity of the Project Site, with stops at Hill Street & Olympic Boulevard and Hill Street & Pico Boulevard.
- Metro Silver Line – The Silver Line is a bus rapid transit service that travels from San Pedro to El Monte Station, with average headways of five minutes during the weekday morning and afternoon peak hours. It provides service to Gardena, Downtown Los Angeles, Cal State L.A., and LAC+USC Medical Center. This line travels along the Harbor Transitway in the vicinity of the Project Site, with stops at Figueroa Street & Olympic Boulevard and Flower Street & Olympic Boulevard.
- LADOT DASH A – Route A is a local line that travels from Little Tokyo to City West, with average headways of seven minutes during the weekday morning and afternoon peak hours. It travels along 7th Street in the vicinity of the Project Site, with a stop at the Metro 7th Street/Metro Center Station.
- LADOT DASH D – Route D is a local line that travels from Union Station to South Park, with average headways of five minutes during the weekday morning and afternoon peak hours. It travels along Hill Street in the vicinity of the Project Site, with a stop at Hill Street & Olympic Boulevard.
- LADOT DASH E – Route E is a local line that travels from City West to the Fashion District, with average headways of five minutes during the weekday morning and afternoon peak

hours. It travels along Los Angeles Street and Pico Boulevard in the vicinity of the Project Site, with stops at Los Angeles Street & 11th Street and Los Angeles Street & 12th Street.

- LADOT DASH F – Route F is a local line that travels from the Financial District to Exposition Park/USC, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It travels along Figueroa Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Figueroa Street & 12th Street.
- LADOT DASH Pico Union/Echo Park – Route Pico Union/Echo Park is a local line that travels from the Metro A (Blue) Line Grand Station to Echo Park, with average headways of 10 to 15 minutes during the weekday morning and afternoon peak hours. It travels along Washington Boulevard in the vicinity of the Project Site, with stops at Grand Avenue & Washington Boulevard and Figueroa Street & Washington Boulevard.
- LADOT CE 419 – Route 419 is a commuter express line that travels from Chatsworth to Downtown Los Angeles, with average headways of 20 minutes during the weekday morning peak hours and 25 minutes during the afternoon peak hours. It provides service to Northridge, Granada Hills, and Mission Hills. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Flower Street & 12th Street.
- LADOT CE 431 – Route 431 is a commuter express line that travels from Westwood to Downtown Los Angeles, with average headways of 30 minutes during the weekday morning peak hours and 25 minutes during the afternoon peak hours. It provides service to Century City, Rancho Park, and Palms. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & Olympic Boulevard and Olive Street & Olympic Boulevard.
- LADOT CE 437 – Route 437 is a commuter express line that travels from Venice to Downtown Los Angeles, with average headways of 25 minutes during the weekday morning peak hours and 30 minutes during the afternoon peak hours. It provides service to Marina del Rey, Mar Vista, and Culver City. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & Olympic Boulevard and Olive Street & Olympic Boulevard.
- LADOT CE 438 – Route 438 is a commuter express line that travels from Redondo Beach to Downtown Los Angeles, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to Hermosa Beach, Manhattan Beach, and El Segundo. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Flower Street & Olympic Boulevard.
- LADOT CE 448 – Route 448 is a commuter express line that travels from Rancho Palos Verdes to Downtown Los Angeles, with average headways of 20 minutes during the weekday morning and afternoon peak hours. It provides service to Rolling Hills Estates and Lomita. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Flower Street & 11th Street.

- LADOT CE 534 – Route 534 is a commuter express line that travels from Westwood to Downtown Los Angeles, with average headways of 25 minutes during the weekday morning and afternoon peak hours. It provides service to the University of California, Los Angeles and Century City. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & Olympic Boulevard and Flower Street & Olympic Boulevard.
- Santa Monica Big Blue Bus Rapid 10 – Route Rapid 10 is a rapid line that travels from Santa Monica to Union Station, with average headways of 20 minutes during the weekday morning and afternoon peak hours. It provides service to Third Street Promenade, West Los Angeles, and Downtown Los Angeles. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & Venice Boulevard and Olive Street & Venice Boulevard.
- Foothill Transit 481 – Route 481 is a weekday peak hour express line that travels from El Monte to Downtown Los Angeles, with average headways of 15 minutes during the weekday morning peak hours and 20 minutes during the afternoon peak hours. It provides service to Cal State L.A., LAC+USC Medical Center, and Union Station. This line travels along Wilshire Boulevard in the vicinity of the Project Site, with stops at Union Avenue & Wilshire Boulevard.
- Foothill Transit 493 – Route 493 is a weekday peak hour express line that travels from Diamond Bar to Downtown Los Angeles, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to the Industry City Hall Park & Ride, Puente Hill Mall Transit Center, and LAC+USC Medical Center. This line travels along Figueroa Street and Hope Street in the vicinity of the Project Site, with stops at Figueroa Street & 11th Street and Hope Street & 12th Street.
- Foothill Transit 497 – Route 497 is a weekday peak hour express line that travels from the Chino Park & Ride to Downtown Los Angeles, with average headways of 15 minutes during the weekday morning and afternoon peak hours. It provides service to the Industry City Hall Park & Ride, Cal State L.A., and LAC+USC Medical Center. This line travels along Figueroa Street and Hope Street in the vicinity of the Project Site, with stops at Figueroa Street & 9th Street and Hope Street & 9th Street.
- Foothill Transit 498 – Route 498 is a weekday peak hour express line that travels from Azusa to Downtown Los Angeles, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to the Citrus College Park & Ride, Cal State L.A., and LAC+USC Medical Center. This line travels along Figueroa Street and Hope Street in the vicinity of the Project Site, with stops at Figueroa Street & 9th Street and Hope Street & 9th Street.
- Foothill Transit 499 – Route 499 is a weekday peak hour express line that travels from the San Dimas Park & Ride to Downtown Los Angeles, with average headways of 10 minutes during the weekday morning peak hours and 15 minutes during the afternoon peak hours. It provides service to the Via Verde Park & Ride, Cal State L.A., and LAC+USC Medical Center.

This line travels along Figueroa Street and Hope Street in the vicinity of the Project Site, with stops at Figueroa Street & 9th Street and Hope Street & 9th Street.

- Foothill Transit 699 – Route 699 is a weekday peak hour express line that travels from Montclair to Downtown Los Angeles, with average headways of 10 minutes during the weekday morning and afternoon peak hours. It provides service to the Fairplex Park & Ride, Cal State L.A., and LAC+USC Medical Center. This line travels along Figueroa Street and Hope Street in the vicinity of the Project Site, with stops at Figueroa Street & 9th Street and Hope Street & 9th Street.
- Foothill Transit Silver Streak – Silver Streak is an express line that travels from Montclair to Downtown Los Angeles, with average headways of 10 to 20 minutes during the weekday morning and afternoon peak hours. It provides service to the Pomona Transit Center, Cal State L.A., and LAC+USC Medical Center. This line travels along Grand Avenue and Olive Street in the vicinity of the Project Site, with stops at Grand Avenue & 9th Street and Olive Street & Olympic Boulevard.
- OCTA 701 – Route 701 is a weekday peak hour express line that travels from Huntington Beach to Downtown Los Angeles, with average headways of 20 minutes during the weekday morning and afternoon peak hours. It provides service to Garden Grove, Los Alamitos, and Seal Beach. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & Olympic Boulevard and Flower Street & Olympic Boulevard.
- OCTA 721 – Route 721 is a weekday peak hour express line that travels from Fullerton to Downtown Los Angeles, with average headways of 30 to 35 minutes during the weekday morning and afternoon peak hours. It provides service to the Metro Green Line Harbor Freeway Station, the Manchester Transitway Station, and the Slauson Transitway Station. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & Olympic Boulevard and Flower Street & Olympic Boulevard.
- Torrance Transit 4 – Route 4 is a weekday peak hour local line that travels from Torrance to Downtown Los Angeles, with average headways of 45 minutes during the weekday morning and afternoon peak hours. It provides service to the Harbor Gateway Transit Center, the Carson/Hawthorne Hub, and USC. This line travels along Figueroa Street and Flower Street in the vicinity of the Project Site, with stops at Figueroa Street & Olympic Boulevard and Flower Street & Olympic Boulevard.
- Gardena Municipal Bus 1X – Route 1X is an express line that travels from Redondo Beach to Downtown Los Angeles, with average headways of 35 minutes during the weekday morning and afternoon peak hours. It provides service to Hawthorne, Torrance, and Gardena. This line travels along Main Street in the vicinity of the Project Site, with stops at Main Street & 11th Street and Main Street & 12th Street.
- Commerce Municipal Bus Citadel Outlet Express – Citadel Outlet Express is an express line that travels from Commerce to Downtown Los Angeles, with average headways of 60 minutes during the weekday morning peak hour and 80 minutes during the afternoon peak hours. It

provides service to The Citadel Outlets, Commerce Casino, Union Station, and L.A. Live. This line travels along Figueroa Street in the vicinity of the Project Site, with a stop at Figueroa Street & Olympic Boulevard.

- Montebello Bus 50 – Route 50 is a local line that travels from La Mirada to Downtown Los Angeles, with average headways of 30 minutes during the weekday morning and afternoon peak hours. It provides service to Whittier, Montebello, and Commerce. This line travels along Hill Street and Flower Street in the vicinity of the Project Site, with stops at Hill Street & 8th Street and Flower Street & 8th Street.

In addition, the proposed Los Angeles Streetcar project would run west along 11th Street adjacent to the Project Site. The streetcar would start at Hill Street, travel east along 1st Street, south along Broadway, west along 11th Street, north along Figueroa Street, east along 7th Street, and north along Hill back to 1st Street. The route would provide access to some of the most valued cultural, entertainment, and business destinations in Downtown Los Angeles. The Streetcar project is being implemented by Los Angeles Streetcar Inc, a public-private partnership funded by a combination of federal grants, Metro bonds funds, City funding and private funding. However, the construction timelines have not been finalized.³

2.6 PROJECT CHARACTERISTICS

The proposed Project includes residential and commercial uses with associated open space on both Sites 2 and 3.

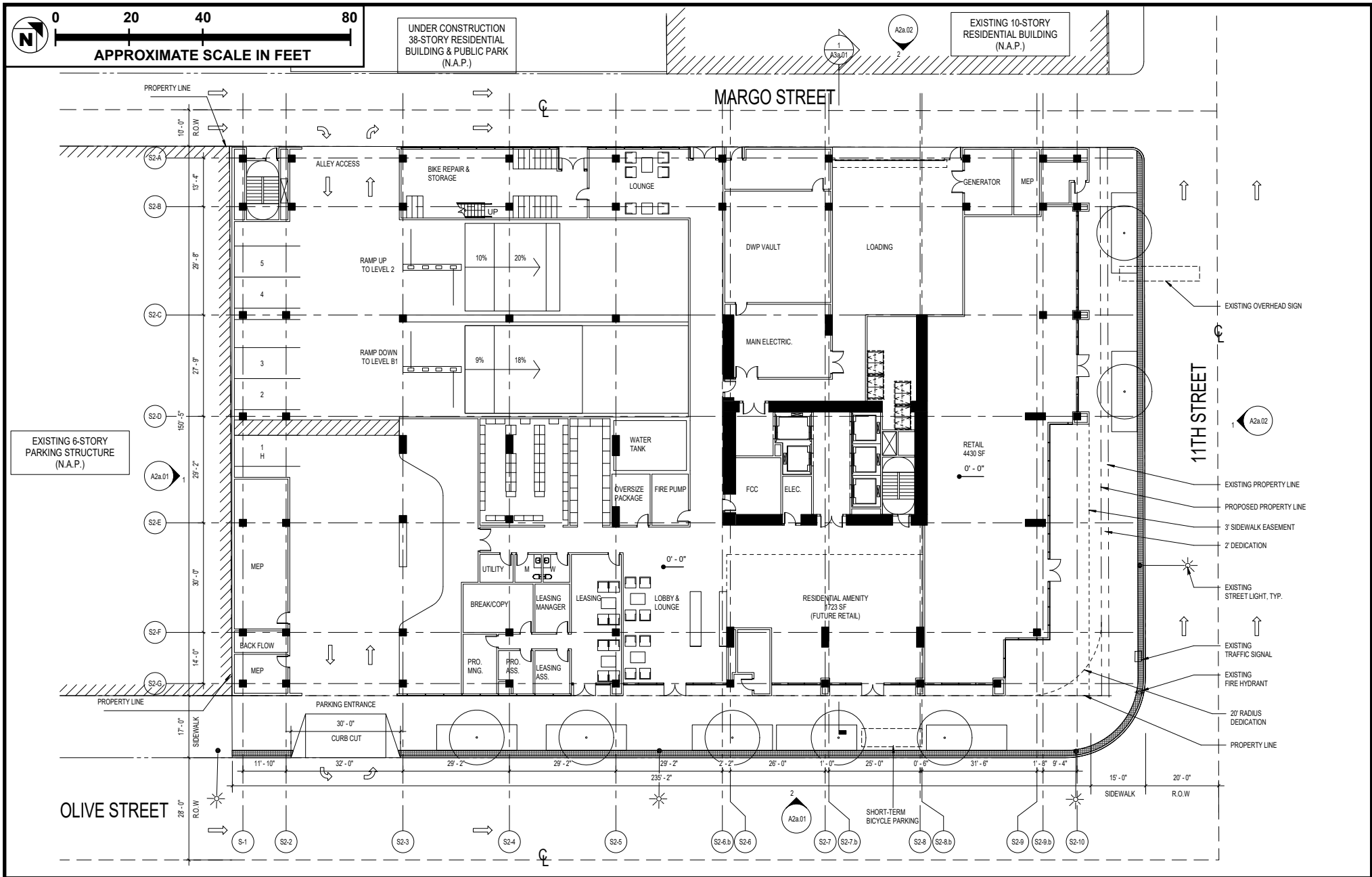
Site 2

Program

Site 2 is bounded by 11th Street to the north, Olive Street to the east, a parking structure to the south, and the Margo Street alley to the west. The proposed development on Site 2 would replace the existing surface parking with a 51-story mixed-use building containing 536 residential units and 4,178 square feet of ground floor commercial uses. The building would have a total floor area of 491,515 square feet and reach approximately 603 feet in height, as summarized in **Table 2-1: Site 2 Summary**.

The commercial component of the ground floor would consist of retail or restaurant uses along most of the 11th Street frontage and a portion of the Olive Street frontage, as shown in **Figure 2-4: Site 2 Ground Floor Plan**. The Olive Street frontage would also feature the residential lobby and parking entrance.

³ Los Angeles Streetcar, Inc. "Project Info." 2016. <https://streetcar.la/project-info/project-summary/>. Accessed September 2021.



SOURCE: CallisonRTKL Inc. - 2023

FIGURE 2-4

The 536 residential units would be located on levels 5-51 and include 89 studio, 268 1-bedroom, 176 2-bedroom, and three 3-bedroom units. Residential amenities would be located on levels five and six, including an outdoor deck, a swimming pool, outdoor dining areas, outdoor event space, a fitness center, a club/lounge room, a co-working room, and a dog run area, as shown in **Figure 2-5: Site 2 Level 6 Plan**. Other common open space is distributed throughout the residential tower including indoor lounge areas and terraces on levels twenty-one, forty-one, and fifty-one.

Six levels of the parking garage would be located beneath the commercial ground floor of the building with three additional levels of above-grade parking located above the commercial ground floor.

**TABLE 2-1
SITE 2 SUMMARY**

General Information	Street Address	1105-1123 S. Olive St.
	APN No's.	5139-020-025, 5139-020-007, and 5139-020-006
	Zoning	C2-4D-O
	General Plan Designation	Regional Center Commercial
	Lot Area	36,120 square feet / 0.83 acres
	Buildable Lot Area (LAMC 14.5.3)	58,839 square feet
	Proposed total floor area	491,515 square feet
	Proposed FAR	9.13:1 (Based on Buildable Lot Area)
Project Details	Building Height	603 feet (51 Stories)
	Residential	536 Units
	Commercial	4,178 square feet
	Open Space	58,275 square feet (Required & Provided)
	Automobile Parking	581 (Required & Provided)
	Bicycle Parking	234 (Required & Provided)

Design

The building would be designed in a modern style, featuring a glass curtain wall with silver and gray metal panels and light grey concrete and stone facades for the podium, as shown in **Figure 2-6: Elevations**. The differentiation of materials between the podium and the tower creates a distinction between these elements. A mural would be installed on the west elevation of the podium facing South Park Commons.

Open Space & Recreational Amenities

The building would have a mix of private open space and common open space for a total of 58,275 square feet of open space. Private open space would consist of balconies for most of the

residential units. Common open space would be provided on Levels 5 and 6 of the podium; on the roof level; as well as outdoor decks on the 21st and 41st floors. Level 5 would feature indoor space for co-working, fitness, and a dog lounge as well as an outdoor dog run. Level 6 would feature indoor fitness and lounge as well as an outdoor amenity deck that would feature a swimming pool, outdoor decks, and planters with ornamental trees. Levels 21, 41 and 51 (the roof) would contain terraces and lounges.

Sustainability & Energy Conservation

The Site 2 Development would feature bicycle parking, electric vehicle car charging stations and parking, and fuel-efficient vehicle parking, to incentivize energy efficient transportation modes. Solar panels would be installed on the Level 6 podium deck and internal lighting systems would be automatically controlled to optimize energy efficiency. Internal materials would include low emitting carpets and paints where possible. External landscaping would feature drought-tolerant plantings. Energy star appliances and water efficient fixtures would be installed throughout.

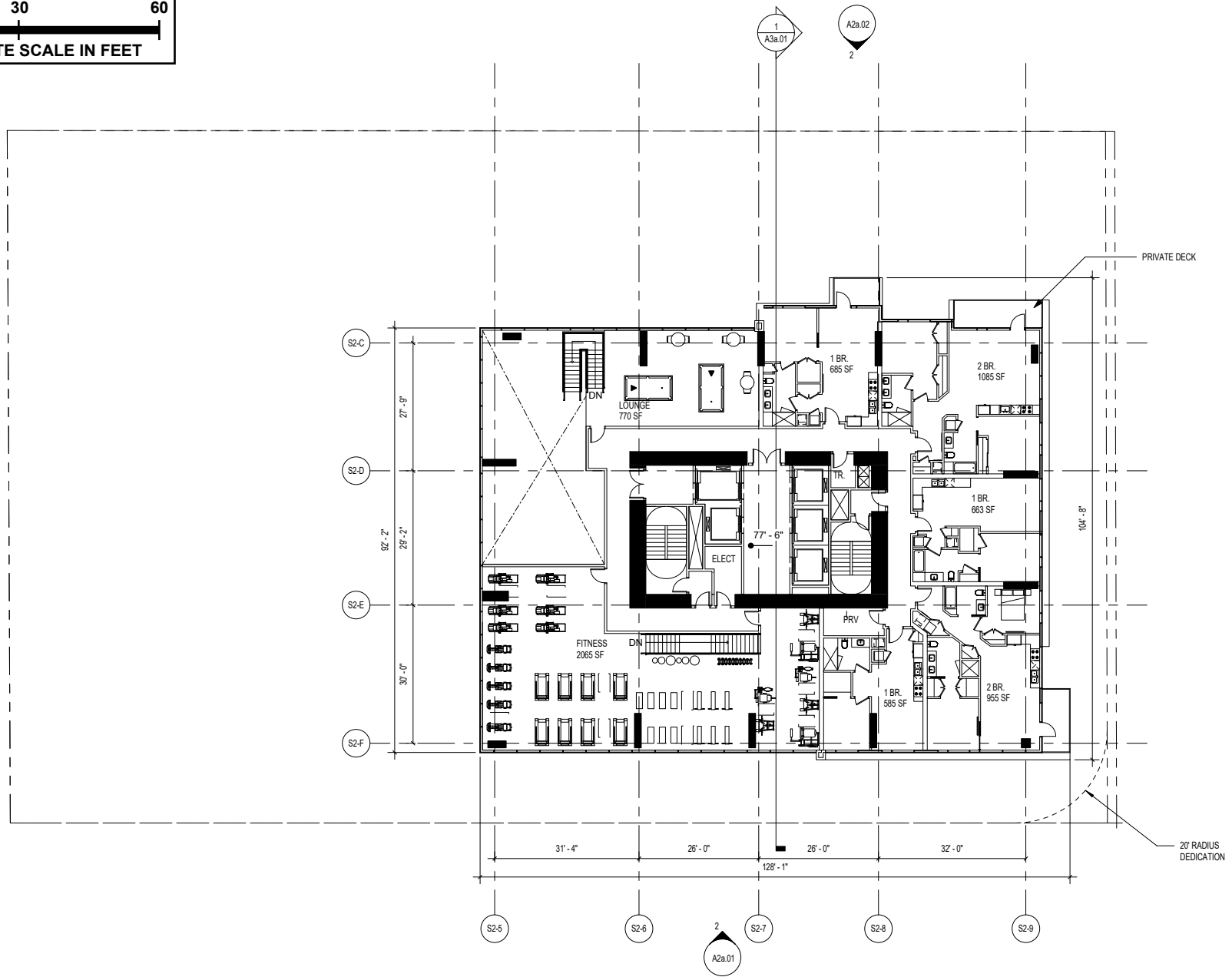
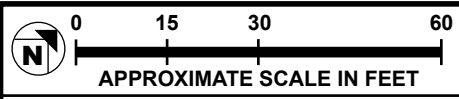
Access & Parking

The ground level of the building would feature pedestrian entrances to the retail space along 11th Street, pedestrian entrances to the leasing lobby and office along Olive Street. Access to on-site parking is provided through a driveway entrance on Olive Street and an entrance on the alley (Margo Street). Bicycle parking would be provided adjacent to the entrance on Margo Street. A pedestrian passage adjacent to the parking entrance would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons. A total of 581 parking spaces would be provided on site within six subterranean basement levels and three above-ground levels occupying the second, third, and fourth floors of the building. Loading for commercial and residential uses, as well as trash collection, would be located through an on-site loading dock accessible from Margo Street.

Streetscape

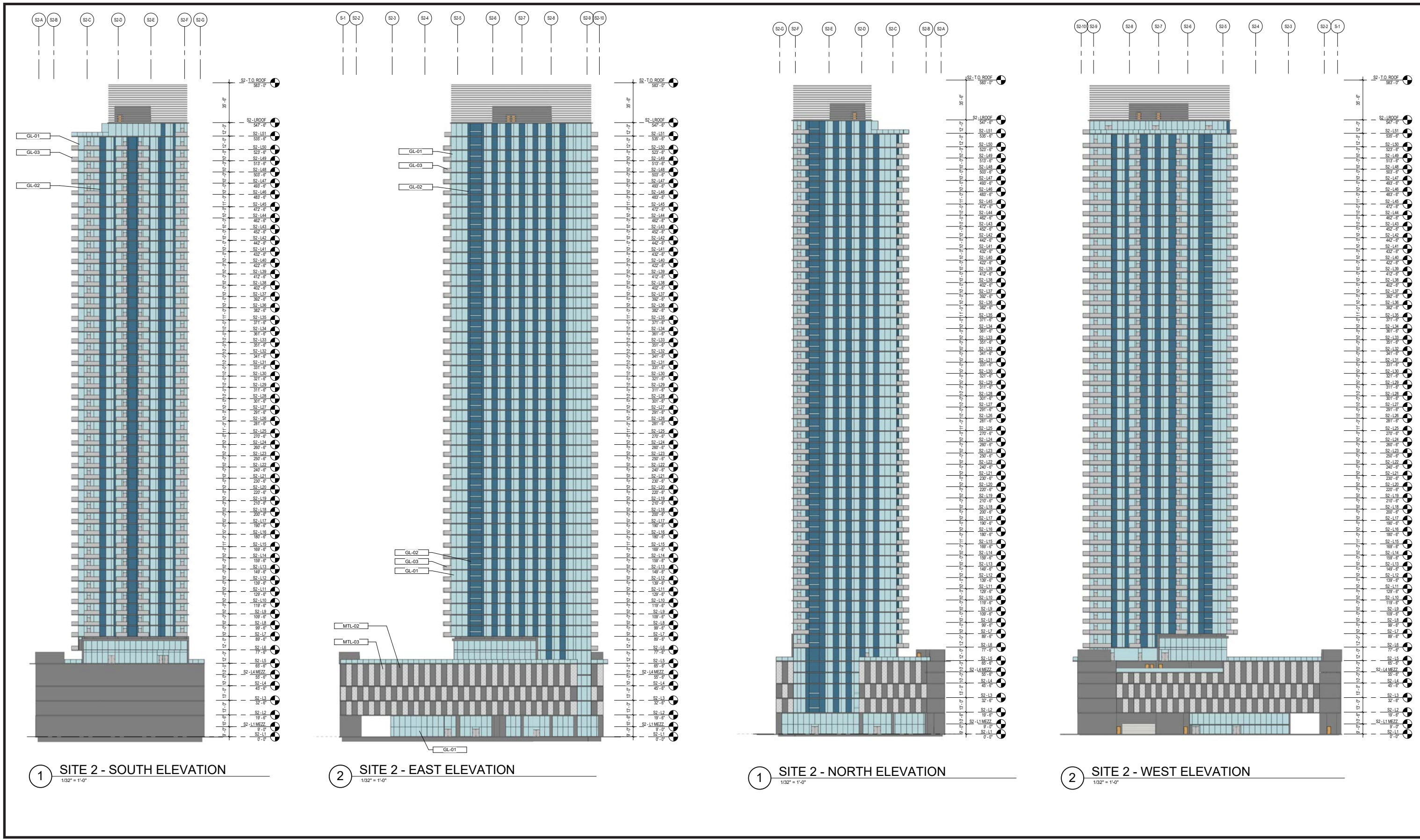
The façade of the building would curve away from the street at the corner of 11th Street and Olive, creating a pedestrian plaza space. The Site 2 Development would require a 15 foot by 15 foot cut corner and a two-foot dedication along 11th Street for sidewalk widening to create the right of way width specified in the City's Mobility Element.

The Project Site includes 10 existing non-protected street trees, including one (1) street tree along Olive Street and two (2) street trees along 11th Street adjacent to Site 2, and four (4) street trees along Olive Street and three (3) street trees adjacent to Site 3. Removal of five (5) existing Indian laurel fig (*Ficus microcarpa*) street trees along the Olive Street edge of the site and replacement with twelve (12) London plane trees (*Platanus acerifolia*) is proposed. In addition, removal of five (5) existing Chinese flame trees (*Koelreuteria bipinnata*) along the 11th Street edge of the Project Site is proposed. These trees would be replaced with five (5) Chinese flame trees.



SOURCE: CallisonRTKL Inc. - 2023

FIGURE 2-5



SOURCE: CallisonRTKL Inc. - 2023

FIGURE 2-6

The proposed removal of street trees is subject to a 2:1 replacement ratio to the satisfaction of the Board of Public Works.

Specifically for Site 2, removal of one (1) street tree on Olive Street and replacement with six (6) new London plane trees and removal of two (2) street trees on 11th Street and replacement with two (2) Chinese flame trees is proposed. The number of replacement street trees for the Project Site is limited to seventeen (17) trees by the City’s location and spacing requirements for street trees. As the 2:1 replacement ration cannot be met, an in-lieu fee will be paid and used to plant street trees in other locations in City Council District 14.

Site 3

Program

Site 3 of the proposed Project is bound by 11th Street to the north, an alleyway to the east, an office tower to the south and Olive Street to the west. The proposed development of Site 3 would replace the existing surface parking lot with a 60-story mixed-use development containing 713 residential units and approximately 11,277 square feet of ground floor commercial floor area, as shown in **Figure 2-7: Site 3 Plot Plan**. The building would be approximately 678 feet in height for a total of 608,977 sf of floor area, as summarized in **Table 2-2: Site 3 Summary**.

**TABLE 2-2
SITE 3 SUMMARY**

General Information	Street Address	1105-1123 S. Olive St.
	APN No’s.	5139-019-040, 5139-019-015, & 5139-019-011
	Zoning	C2-4D-O
	General Plan Designation	Regional Center Commercial
	Lot Area	46,807 square feet / 1.07 acres
	Buildable Lot Area (LAMC 14.5.3)	67,678 square feet
	Proposed total floor area	608,977 square feet
	Proposed FAR	9.00:1 (Based on Buildable Lot Area)
	Building Height	678 feet (60 Stories)
Project Details	Residential	713 Units
	Commercial	11,277 square feet
	Open Space	75,425 square feet (Required & Provided)
	Automobile Parking	764 (Required & Provided)
	Bicycle Parking	290 (Required & Provided)

Design

The building would be designed in a modern style, featuring glass curtain wall, metal panels and masonry. The parking podium and the residential tower would be differentiated by use of materials and colors, as shown in **Figure 2-8: Site 3 Renderings**.

Open Space & Recreational Amenities

The building would have a mix of private open space and common open space for at least 75,425 square feet of open space. Private open space would consist of balconies for most of the residential units. Common open space would be provided on Levels 4, 5, and 6 of the podium and on upper-level terraces and lounges.

Sustainability & Energy Conservation

The Site 3 Development would feature bicycle parking, electric vehicle car charging stations and parking, and fuel-efficient vehicle parking, to incentivize energy efficient transportation modes. Internal materials would include low emitting carpets and paints where possible. External landscaping would feature drought tolerant plantings. Energy star appliances and water efficient fixtures would be installed throughout.

Access & Parking

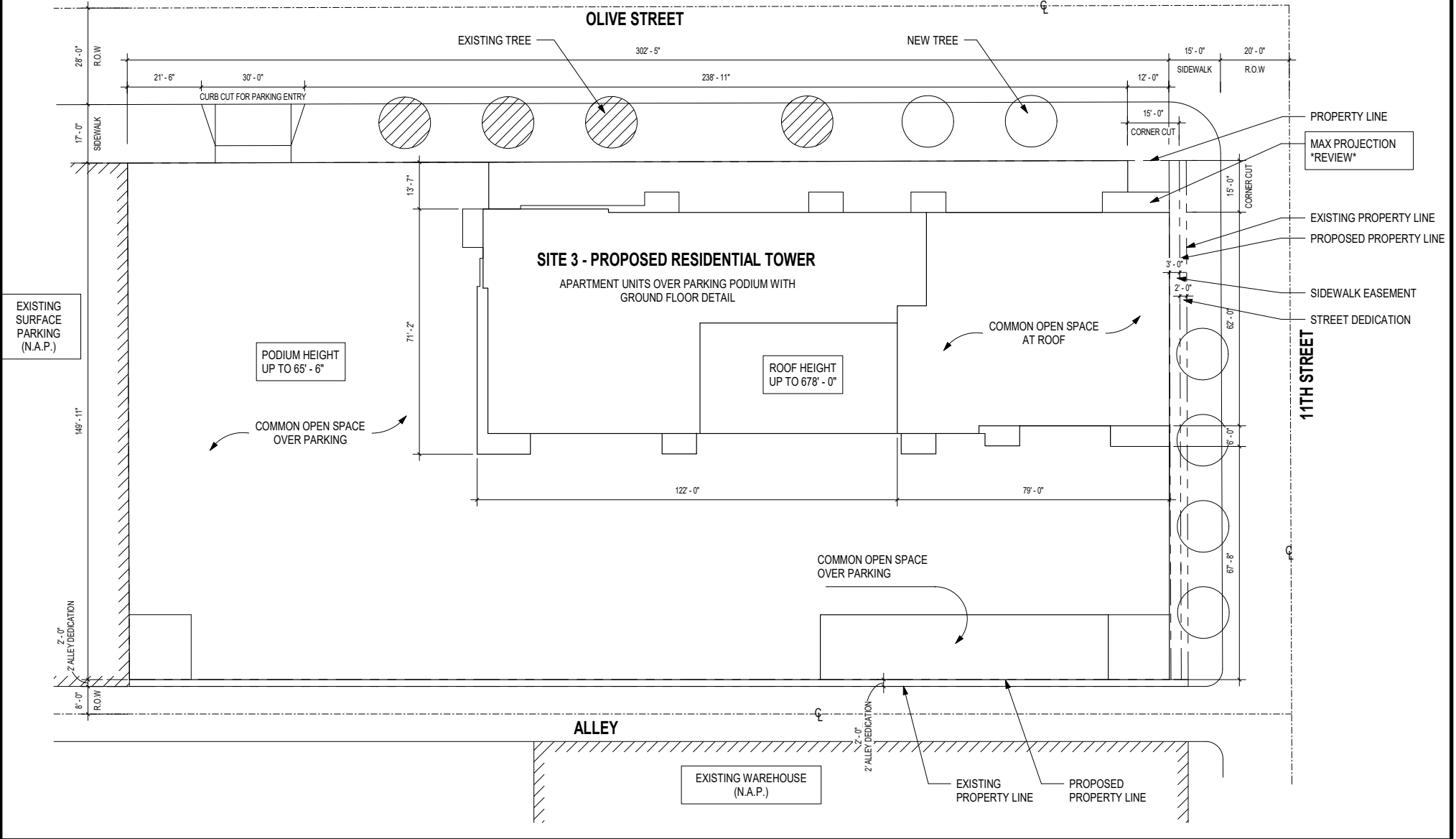
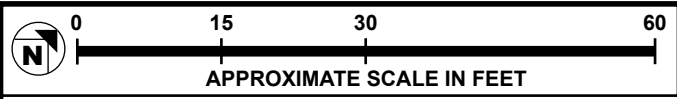
The ground level of the building would feature pedestrian entrances to the retail space along 11th Street, pedestrian entrances to the leasing lobby and office along Olive Street. Access to on-site parking is provided through a driveway entrance on Olive Street. Bicycle parking would be provided on the ground floor adjacent to the automobile car park entrance. A total of 764 parking spaces would be provided on site. Loading for commercial and residential uses, as well as trash collection, would be located through an on-site loading dock accessible from the alley on the east side of the site.

Streetscape

External street-facing patio space would be provided to complement the retail uses along 11th Street.

The Project Site includes ten (10) existing non-protected street trees, including one (1) street tree along Olive Street and two (2) street trees along 11th Streets adjacent to the Site 2 and four (4) street trees along Olive Street and three (3) street trees adjacent to the Site 3. Removal of these ten (10) street trees and replacement with seventeen (17) street trees is proposed.

Removal of five (5) existing Indian laurel fig (*Ficus microcarpa*) street trees along the Olive Street edge of the Project Site and replacement with twelve (12) London plane trees (*Platanus acerifolia*) is proposed.

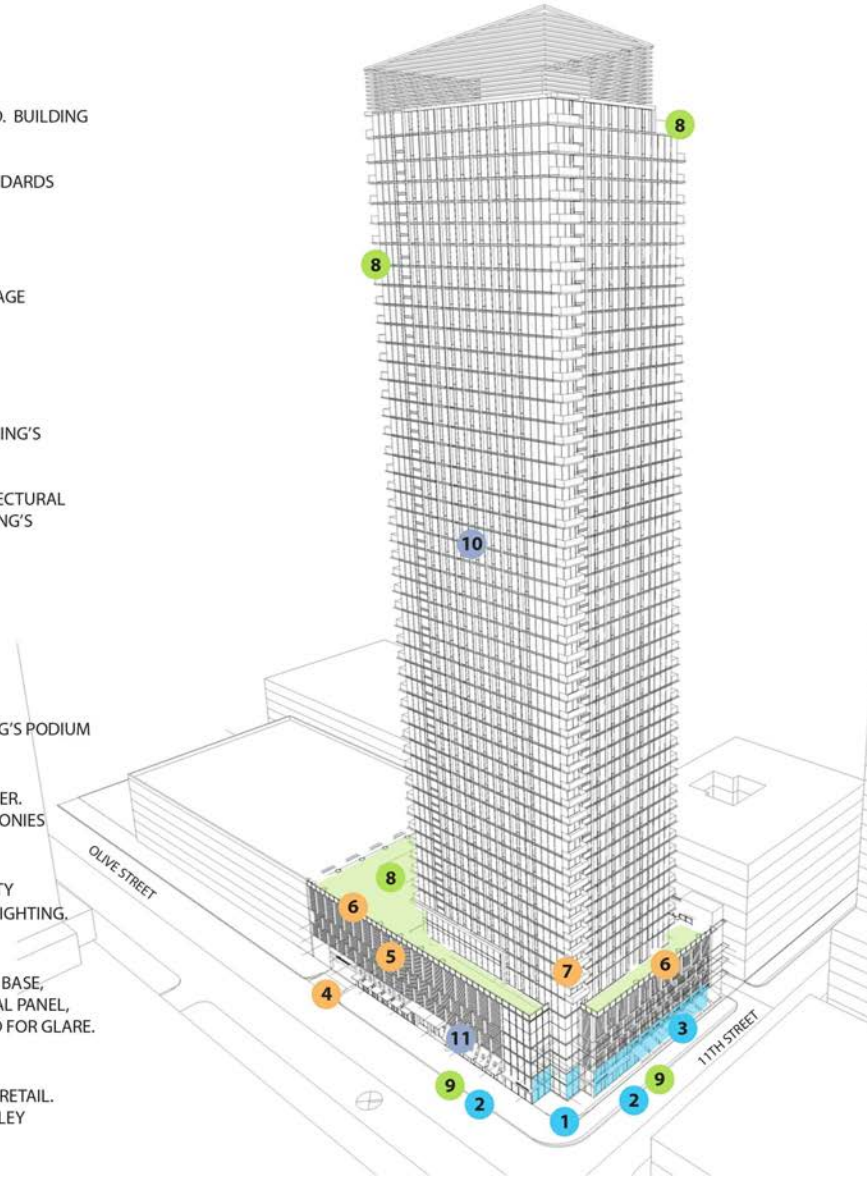


SOURCE: CallisonRTKL Inc. - 2023

FIGURE 2-7

DESIGN PRINCIPLES

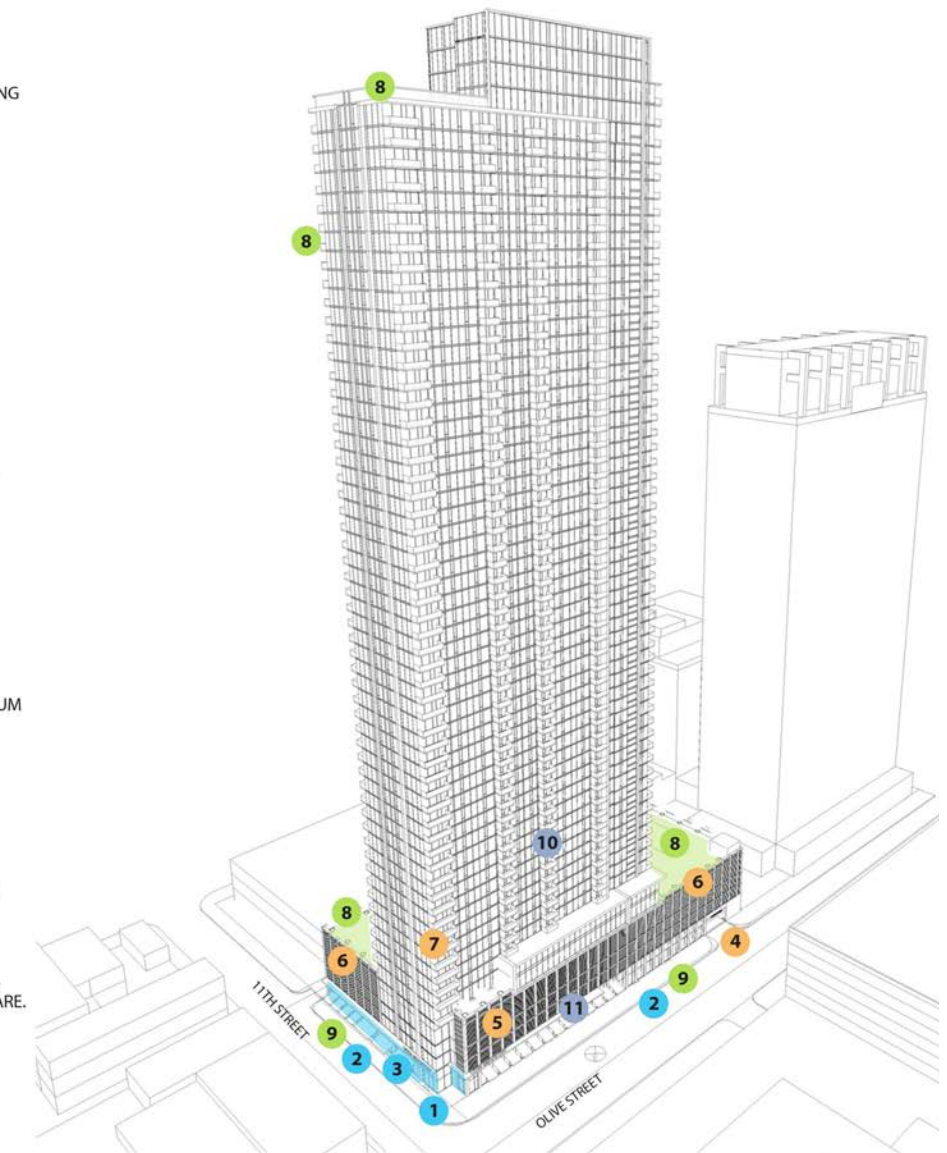
- 1 SIDEWALKS AND SETBACKS**
-BUILDING SETBACKS ON 11TH AND OLIVE STREETS NOT REQUIRED. BUILDING STEPS BACK AT CORNER ONLY TO ACCENTUATE TOWER.
- 2 -SIDEWALK DIMENSIONS COMPLY WITH DOWNTOWN STREET STANDARDS**
OLIVE ST: 17'
11TH ST: 15'
- 3 GROUND FLOOR TREATMENT**
-11TH ST. IS A RETAIL ST, REQUIRING A MIN. OF 75% ACTIVE FRONTAGE AND A MIN OF 25' RETAIL DEPTH
PROJECT PROVIDES IN EXCESS OF 75% FRONTAGE AND 25' DEPTH
- 4 PARKING AND ACCESS**
- PARKING ACCESS OCCURS ON OLIVE STREET, MID-BLOCK
PRIORITIZING ACTIVE LOBBY AND RETAIL USE TOWARDS THE BUILDING'S CORNER
- 5 3 LEVELS OF ABOVE GRADE PARKING ARE SCREENED WITH ARCHITECTURAL PANELS IN A RHYTHM AND SCALE SEEN THROUGHOUT THE BUILDING'S PODIUM**
- 6 MASSING AND STREET WALL**
45' MIN STREET WALL REQ'D / 63' PROVIDED
80% STREET WALL REQ'D ON 11TH ST / 80% PROVIDED
75% STREET WALL REQ'D ON OLIVE ST. / 75% PROVIDED
- 7 TOWER MASSING IS VISUALLY CONNECTED TO THE GROUND AT THE CORNER OF 11TH AND OLIVE AND INTEGRATED WITH BUILDING'S PODIUM**
- 8 OPEN SPACE AND LANDSCAPE**
OPEN SPACE IS PROVIDED AT THE ROOF OF THE PODIUM AND TOWER. ADDITIONALLY, A PORTION OF THE RESIDENTIAL UNITS HAVE BALCONIES
- 9 STREETScape IMPROVEMENTS**
STREETScape IMPROVEMENTS INCLUDE WIDER SIDEWALKS PER CITY STANDARDS, NEW STREET TREES, ACTIVE USES AND PEDESTRIAN LIGHTING.
- 10 ARCHITECTURAL DETAIL**
ARCHITECTURAL DETAIL AND MATERIALITY IDENTIFIES A DISTINCT BASE, TOWER, AND TOP. MATERIALS TO INCLUDE GLAZING SYSTEM, METAL PANEL, LOUVER AND MASONRY. EXTERIOR LIGHTING AT FACADE SHIELDED FOR GLARE.
- 11 ARCHITECTURAL SIGNAGE**
BUILDING SIGNAGE LIMITED TO PODIUM IDENTIFYING LOBBY AND RETAIL. WAYFINDING SIGNAGE AT PARKING ENTRANCE AND SERVICE AT ALLEY



Site 2

DESIGN PRINCIPLES

- 1 SIDEWALKS AND SETBACKS**
-BUILDING SETBACKS ON 11TH AND OLIVE STREETS NOT REQUIRED. BUILDING STEPS BACK AT CORNER ONLY TO ACCENTUATE TOWER.
- 2 -SIDEWALK DIMENSIONS COMPLY WITH DOWNTOWN STREET STANDARDS**
OLIVE ST: 17'
11TH ST: 15'
- 3 GROUND FLOOR TREATMENT**
-11TH ST. IS A RETAIL ST, REQUIRING A MIN. OF 75% ACTIVE FRONTAGE AND A MIN OF 25' RETAIL DEPTH
PROJECT PROVIDES IN EXCESS OF 75% FRONTAGE AND 25' DEPTH
- 4 PARKING AND ACCESS**
- PARKING ACCESS OCCURS ON OLIVE STREET, MID-BLOCK
PRIORITIZING ACTIVE LOBBY AND RETAIL USE TOWARDS THE BUILDING'S CORNER
- 5 3 LEVELS OF ABOVE GRADE PARKING ARE SCREENED WITH ARCHITECTURAL PANELS IN A RHYTHM AND SCALE SEEN THROUGHOUT THE BUILDING'S PODIUM**
- 6 MASSING AND STREET WALL**
45' MIN STREET WALL REQ'D / 63' PROVIDED
80% STREET WALL REQ'D ON 11TH ST / 80% PROVIDED
75% STREET WALL REQ'D ON OLIVE ST. / 75% PROVIDED
- 7 TOWER MASSING IS VISUALLY CONNECTED TO THE GROUND AT THE CORNER OF 11TH AND OLIVE AND INTEGRATED WITH BUILDING'S PODIUM**
- 8 OPEN SPACE AND LANDSCAPE**
OPEN SPACE IS PROVIDED AT THE ROOF OF THE PODIUM AND TOWER. ADDITIONALLY, A PORTION OF THE RESIDENTIAL UNITS HAVE BALCONIES
- 9 STREETScape IMPROVEMENTS**
STREETScape IMPROVEMENTS INCLUDE WIDER SIDEWALKS PER CITY STANDARDS, NEW STREET TREES, ACTIVE USES, AND PEDESTRIAN LIGHTING.
- 10 ARCHITECTURAL DETAIL**
ARCHITECTURAL DETAIL AND MATERIALITY IDENTIFIES A DISTINCT BASE, TOWER, AND TOP. MATERIALS TO INCLUDE GLAZING SYSTEM, METAL PANEL, LOUVER AND MASONRY. EXTERIOR LIGHTING AT FACADE SHIELDED FOR GLARE.
- 11 ARCHITECTURAL SIGNAGE**
BUILDING SIGNAGE LIMITED TO PODIUM IDENTIFYING LOBBY AND RETAIL. WAYFINDING SIGNAGE AT PARKING ENTRANCE AND SERVICE AT ALLEY



Site 3

SOURCE: CallisonRTKL Inc. - 2023

FIGURE 2-8

In addition, removal of five (5) existing Chinese flame trees (*Koelreuteria bipinnata*) along the 11th Street edge of the site and replacement with five (5) new Chinese flame trees is proposed.

Specifically for Site 3, removal of four (4) street trees on Olive Street and replacement with six (6) new London plane trees, and removal of three (3) street trees on 11th Street and replacement with three (3) Chinese flame trees is proposed.

Removal of street trees is subject to a 2:1 replacement ratio to the satisfaction of the Board of Public Works. As described above, removal of ten (10) street trees and replacement with seventeen (17) new street trees is proposed for the Project Site. The number of replacement street trees is limited to seventeen (17) trees by the City's location and spacing requirements for street trees. As the 2:1 replacement ration cannot be met, an in-lieu fee will be paid and used to plant street trees in other locations in City Council District 14.

2.7 CONSTRUCTION

Construction of Site 2 is expected to commence by mid-2024 and be completed by late 2026. Construction would include (1) site mobilization/site utilities, which would last approximately 1 month; (2) mass excavation, which would last approximately 4 months; (3) foundations/structure to grade, which would last approximately 5 months; (4) podium/garage structure, which would last approximately 3 months; (5) tower structure, which would last approximately 12 months; (6) Interiors, which would last approximately 3 months; (7) Testing and Inspections, which would last approximately 6 months. The Site 2 Development would export approximately 118,543 cubic yards of earth.

Construction activities would be performed in accordance with all applicable City, State, and federal laws. As stated in Section 41.40 of the Los Angeles Municipal Code (LAMC), the permissible hours of construction involving noise-generating equipment within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities as needed. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, if required, would be properly permitted by the City, and would conform to City standards.

Construction of Site 3 is expected to occur after the completion of Site 2 and would require a similar construction timeline. While there is the potential for some overlap in construction between the two sites, site preparation of Site 3 would not occur until after construction of the structure of Site 2 was underway. Construction activities on Site 3 would be performed in accordance with all applicable City, State, and federal laws. As stated in Section 41.40 of the Los Angeles Municipal

Code (LAMC), the permissible hours of construction involving noise-generating equipment within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hookups, delivery of materials, and other construction activities as needed. Site deliveries and staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, if required, would be properly permitted by the City, and would conform to City standards. The Site 3 Development would export approximately 156,232 cubic yards of earth.

2.8 APPROVAL ACTIONS

The development proposed for Site 2 would require the approval by the City of the following:

- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages at a maximum of four establishments, including two (2) on-site sales and consumption and two (2) off-site sales;
- Pursuant to LAMC Section 12.27, a Zone Variance for reduced parking stall size to allow 8 feet, 6 inches by 16 feet in lieu of 9 feet, 4 inches by 18 feet, and reduced drive aisle width of a minimum 25 feet, 1 inch in lieu of 27 feet, 4 inches, as otherwise required by LAMC Section 12.21 A.5;
- Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.7, a Transfer of Floor Area Rights from the Los Angeles Convention Center (Donor Site) for the transfer of 274,795 square feet of floor area to the Project Site (Receiver Site) permitting a maximum FAR of 9.13:1 in lieu of the maximum permitted FAR of 6:1;
- Pursuant to LAMC Section 12.21 G.3, a Director's Decision to provide 115 trees on site in lieu of 134 trees as otherwise required;
- Pursuant to LAMC Section 16.05 C.1, a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units;
- Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82109 for the merger and re-subdivision of five (5) lots into a 19-lot subdivision consisting of 536 residential condominium units and 10 commercial condominium units; haul route for the export of 118,543 cubic yards of earth material; vacation of a portion of the airspace above an alley abutting the site to the northwest; and
- Approval of other permits, ministerial or discretionary, that may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to, landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, tree removal permits, building permits, and installation and hookup approvals for public utilities and related permits.

The development proposed for Site 3 would require the approval by the City of the following:

- Pursuant to Los Angeles Municipal Code (LAMC) Section 14.5.7, a Transfer of Floor Area Rights from the Los Angeles Convention Center (Donor Site) for the transfer of 328,135 square feet of floor area to the Project Site (Receiver Site) permitting a maximum FAR of 9:1 in lieu of the maximum permitted FAR of 6:1;
- Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit for the sale and dispensing of a full line of alcoholic beverages at a maximum of six establishments including three (3) on-site sales and consumption and three (3) off-site sales;
- Pursuant to LAMC Section 12.27, a Zone Variance for reduced parking stall size to allow 8 feet, 6 inches by 16 feet in lieu of 9 feet, 4 inches by 18 feet, and reduced drive aisle width of a minimum 25 feet, 1 inch in lieu of 27 feet, 4 inches, as otherwise required by LAMC Section 12.21 A.5;
- Pursuant to LAMC Section 12.21 G.3, a Director's Decision to provide 128 trees on site in lieu of 178 trees as otherwise required;
- Pursuant to LAMC Section 16.05 C.1, a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units;
- Pursuant to LAMC Sections 17.03, 17.06, and 17.15, Vesting Tentative Tract Map No. 82141 for the merger and re-subdivision of six (6) lots into a 17-lot subdivision consisting of 713 residential condominium units and 10 commercial condominium units; haul route for the export of 156,232 cubic yards of earth material; and
- Approval of other permits, ministerial or discretionary, that may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, tree removal permits, building permits, and installation and hookup approvals for public utilities and related permits.

This SCEA would serve as the environmental document for the City's discretionary action and ministerial permits or approvals associated with development of the Project, including approval of haul routes for Project Site grading and excavation. This document is also intended to cover all federal, State, regional, and/or local government discretionary or ministerial permits or approvals that may be required to develop the Project, whether or not they are explicitly listed above.

2.9 RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the

effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Based on this guidance, an adequate discussion of potential cumulative impacts can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, Statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, proposed, recently approved, under construction, or reasonably foreseeable projects that could

produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation, as shown in **Table 2-3: Related Projects List**. In addition, the growth projections contained in SCAG's *Connect SoCal: Regional Transportation Plan (RTP) / Sustainable Communities Strategies (SCS)* were considered when evaluating cumulative impacts.

**TABLE 2-3
RELATED PROJECTS LIST**

No.	Name	Address	Uses
1.	LA Trade Tech College	400 W Washington Bl	6,300 Students
2.	124 E Olympic Bl	124 E Olympic Bl	149-room hotel, 1,459 sf rooftop restaurant/bar, and 6,816 sf restaurant space
3.	11th & Hill Project	1115 S Hill St	172 condominium units and 6,850 sf restaurant
4.	Grand Residence	1229 S Grand Ave	161 condominium units and 3,000 sf restaurant
5.	1045 S Olive Street	1045 S Olive St	800 condominium units and 15,000 sf retail
6.	Hotel	1138 S Broadway	138-room hotel
7.	Amazon Project	1133 S Hope St	208 condominium units and 5,029 sf retail
8.	Restaurant	1036 S Grand Ave	7,149 sf restaurant
9.	1219 S Hope Street	1219 S Hope St	75 hotel rooms and 2,650 sf retail
10.	Morrison Hotel	1246 S Hope St	258 high-rise apartments, 265 hotel rooms, and 6,000 sf retail
11.	SPR-Mixed-use Onyx West & East	1300 S Hope St	419 apartment units and 42,000 sf retail
12.	Olympic & Hill Mixed Use	1030 S Hill St	700 apartment units, 7,000 sf retail, 7,000 sf restaurant
13.	1323 S Flower Street MU	1323 S Flower St	132-room hotel, 47 apartment units, and 4,000 sf rooftop bar/restaurant
14.	Flower Mixed-Use	1212 S Flower St	730 condominium units and 7,873 sf retail
15.	14th & Olive Mixed-Use	1340 S Olive St	156 apartment units, 5,000 sf retail and 10,000 sf restaurant
16.	Washington Bl Mixed-Use	200 E Washington Bl	111 affordable housing apartments, one apartment units, 7,300 sf retail
17.	14th St/Hill St (DTLA) Mixed-Use	1340 S Hill St	235 apartment units, 5,250 sf retail, and 4,000 sf restaurant
18.	Ethos Society	806 S Garland Ave	118 apartment units, 69,295 sf office, 2,439 sf retail, 1,132 sf restaurant, 2,684 sf gym/spa
19.	Mixed-use	1100 S Main St	379 apartment units and 25,810 sf retail
20.	Broadway Mixed-Use	955 S Broadway	163 apartment units and 6,406 sf retail

No.	Name	Address	Uses
21.	Mixed-Use	1334 S Flower St	188 apartment units and 10,096 sf retail/restaurant
22.	South Park Towers	1600 S Flower St	250 high-rise apartment units, 300-room hotel, 3,120 sf restaurant, 10,000 sf medical office
23.	City Lights	1300 S Figueroa St	1,024 hotel rooms
24.	Hill Street Mixed-Use	920 S Hill St	239 apartment units and 5,400 sf retail
25.	1370 S Flower Street Residential	1410 S Flower St	152 apartment units and 1,184 sf retail
26.	Broadway Palace	928 S Broadway	667 apartment units, 17 condominium units, and 58,800 sf retail
27.	Los Angeles Sports & Entertainment District	Figueroa St & Chick Hearn St	250,000 sf convention center expansion, 183-room hotel, 601,800 sf office, 1,152 apartment units, and 214,583 sf retail
28.	Embassy Tower	848 S Grand Ave	420 condominium units and 38,500 sf retail
29.	CIM South Park Apartments	888 S Hope St	526 apartment units
30.	1400 S Figueroa Street Residential Project	1400 S Figueroa St	106 apartment units and 4,834 sf retail
31.	845 Olive & 842 Grand Mixed-Use	845 S Olive St	208 apartment units and 2,430 sf retail
32.	Alexan South Broadway	850 S Hill St	305 apartment units, 3,500 sf retail, and 3,500 sf restaurant
33.	Olympic Tower	815 W Olympic Bl	374 condominium units, 373 hotel rooms, 33,498 sf office, 65,074 sf retail, and 10,801 sf conference center
34.	Apex Phase II	700 W 9th St	341 condominium units and 11,687 sf retail
35.	Prop Co II Site 3	1120 S Olive St	713 high-rise apartment units, 7,125 sf retail, 7,125 sf restaurant
36.	Mixed-Use	820 S Olive St	589 apartment units and 4,500 sf retail
37.	Figueroa Centre	911 S Figueroa St	220 hotel rooms, 200 apartment units, and 94,080 sf commercial
38.	1018 W Ingraham St	1018 W Ingraham St	43 apartment units and 7,400 sf retail
39.	Metropolis Mixed-Use	899 S Francisco St	836 condominium units, 480 hotel rooms, 988,225 sf office, and 46,000 sf retail
40.	Foreman and Clark Building	701 S Hill St	165 apartments, 11,902 sf restaurant, and 14,032 sf restaurant
41.	8th/Grand/Hope Project	754 S Hope St	409 condominium units and 7,329 sf retail
42.	Convention Center Modernization	NW Corner of Figueroa St & Venice Bl	Increase floor area by 1.8 million sf
43.	Mixed-Use	233 W Washington Bl	160 apartment units and 24,000 sf retail
44.	Mixed-Use	737 S Spring St	320 apartment units and 25,000 sf pharmacy/drugstore

No.	Name	Address	Uses
45.	Mitsui Fudosan (Eighth and Figueroa Tower)	744 S Figueroa St	436 apartment units, 3,750 sf restaurant, and 3,750 sf retail
46.	Mixed-Use	732 S Spring St	400 apartment units and 15,000 sf retail
47.	Mixed-Use	755 S Los Angeles St	60,243 sf office, 16,694 sf retail, and 26,959 sf restaurant
48.	The City Market (Mixed-Use)	1057 S San Pedro St	877 apartment units, 68 condominium units, 210 hotel rooms, 549,141 sf office, 224,862 sf retail, and 744 cinema seats
49.	Mack Urban Site 1A	1155 S Olive St	258 room hotel, 1,896 sf specialty retail use, and 2,722 sf restaurant use
50.	The Reef - LA Mart/SOLA Village	1900 S Broadway	900 condominium units, 550 apartment units, 210 hotel rms, 143,100 sf retail, 180,000 sf office, 17,600 sf gallery/museum, and 8,000 sf gym
51.	Spring Street Hotel	633 S Spring St	176 hotel rooms, 5,290 sf bar, and 8,430 sf restaurant
52.	7th & Maple Mixed-Use	701 S Maple Ave	452 apartment units, 6,800 sf retail, and 6,800 sf restaurant
53.	Southern California Flower Market Project	755 S Wall St	322 apartment units, 53,200 sf office, and 8,820 sf commercial
54.	Mixed-Use	601 S Main St	452 apartment units and 25,000 sf retail
55.	Mixed-Use (Herald Examiner)	1111 S Broadway	214 apartment units and 10,000 sf retail
56.	1323 S Grand Ave	1323 S Grand Ave	284 apartment units and 6,300 sf commercial
57.	940 S Hill Mixed-Use	940 S Hill St	232 apartment units and 14,000 sf retail
58.	LUXE Hotel Mixed-Use project	1020 S Figueroa St	435 condominium units, 300 hotel rooms, and 58,959 sf retail
59.	Fig + Pico Conference Center Hotels	1248-1260 S Figueroa St	1,162 hotel rooms and 13,145 sf restaurant
60.	949 S Hope Street Mixed-Use Development	949 S Hope St	236 apartment units and 5,954 sf retail
61.	Olympia Mixed-Use	1001 Olympic Bl	1,367 apartment units, 20,000 sf retail, and 20,000 sf restaurant
62.	Downtown LA Hotel	926 James M Wood Bl	247 hotel rooms
63.	945 W 8th Street	845 W 8th St	781 apartment units, and 6,700 sf commercial

Source: *Transportation Assessment for the DTLA South Park Properties Sites 2 & 3 Project, 1005 and 1120 S Olive Street, Los Angeles, California prepared by Gibson Transportation Consulting, Inc. in December 2019 (see Appendix J.1).*

3.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT CRITERIA

3.1 SENATE BILL 375 REGULATORY BACKGROUND

Through “The Sustainable Communities and Climate Protection Act of 2008,” known as Senate Bill 375 (SB 375), the state legislature created a new document for environmental review called a Sustainable Communities Environmental Assessment (SCEA). The intent of a SCEA is to encourage projects that would implement regional plans to reduce greenhouse gas emissions (e.g., by building housing near public transit) by providing for streamlined environmental review of “Transit Priority Projects” that are consistent with an adopted sustainable communities strategy. The SCEA provides complete environmental analysis by evaluating the potential effects of a Project in an Initial Study similar to a Mitigated Negative Declaration with additional requirements specific to a SCEA as described below.

SB 375 sought to integrate transportation and land use planning to reduce greenhouse gas emissions by directing the State’s metropolitan planning organizations that prepare regional transportation plans to include in those plans a “sustainable communities strategy” to achieve greenhouse gas emission targets set by the California Air Resources Board.^{1,2} 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). In September 2020, the Southern California Association of Governments (SCAG) adopted the *2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) called *Connect SoCal*.

3.2 TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provided CEQA streamlining provisions for projects that are consistent with an adopted applicable RTP/SCS and meet certain other criteria. Cities acting as lead CEQA agency within the SCAG region can now prepare a SCEA as the environmental CEQA Clearance for “transit priority projects” that are consistent with SCAG’s *Connect SoCal 2020–2045 RTP/SCS*. A transit priority project is a project that meets the following four criteria:³

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in *Connect SoCal 2020–2045 RTP/SCS*;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

¹ California Code of Regulations. SB 375, (Chapter 728, Statutes of 2008) § 1; Chapter 354, Statutes of 2009. § 5.

² California Government Code. § 65080, subd. (b)(2)(B).

³ Public Resource Code (PRC). Section 21155(a) and (b).

3. Provides a minimum net density of at least 20 units per acre; and
4. Is located within one-half mile of a major transit stop or high-quality transit corridor included in the *2020–2045 RTP/SCS*.

As explained below, the proposed Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to PRC Section 21155.

Consistency with Criterion 1: Project use designation, density, building intensity, and applicable policies specified for the Project area in the SCAG 2020–2045 RTP/SCS.

PRC §21155(a) states that a SCEA is only applicable for a Transit Priority Project that is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the applicable metropolitan planning organization, in this case the Southern California Association of Governments (SCAG).

On September 3, 2020, SCAG’s Regional Council approved and adopted the *2020–2045 RTP/SCS* called *Connect SoCal*. On October 30, 2020, pursuant to California Government Code Section 65080(b)(2)(1), CARB accepted SCAG’s determination that its *2020–2045 RTP/SCS* would, when implemented, meet the applicable 2035 greenhouse gas (GHG) 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.

The core vision of *Connect SoCal: 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. *Connect SoCal* focuses on transportation infrastructure and existing job centers in order to determine where future growth of employment and households would likely occur. Priority Growth Areas have been identified in the region where growth is forecasted to occur due to proximity to existing and planned transit, existing job centers, existing and planned infrastructure to support more walkability and use of alternative transportation modes, and in areas identified for jurisdictional expansion (i.e., spheres of influence). These Priority Growth Areas include Transit Priority Areas, High Quality Transit Areas, Job Centers, Livable Corridors, and Neighborhood Mobility Areas. Collectively, these Priority Growth Areas are anticipated to contain 95 percent of the growth in the region through the horizon year of 2045.

Use Designation

Connect SoCal did not identify specific use designations for locations, but rather builds upon the typology defined in SCAG’s *2020-2045 RTP/SCS*. SCAG used data from local jurisdictions, including general plans, to develop 35 Place Types and classified locations into one of three Land Use Development Categories (LDCs): urban, compact, or standard. SCAG used each of these

categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. The Project Site is within an area designated as “Urban,” which SCAG describes as areas often found within and/or directly adjacent to moderate and high-density urban centers, where virtually all new development would be considered infill or redevelopment. The Project is an infill redevelopment of a mixed-use project featuring higher density multifamily residential in a location with high level of mobility due to its access to mass transit. As such, it is consistent with the LDC specified by SCAG in the *2020–2045 RTP/SCS*.

The *2020–2045 RTP/SCS* identified Priority Growth Areas (PGAs) within which the land use strategies are expected to be realized. PGAs include the following categories, which may overlap:

- **Transit Priority Areas (TPAs):** TPAs are PGAs within one half mile of existing or planned ‘major’ transit stops in the region. Although TPAs comprise a small percentage of the SCAG region’s land area, the majority of new households are projected to occur within them as these are areas where people can live, work, and play in higher density, compact communities with ready access to a multitude of safe and convenient transportation alternatives.
- **High Quality Transit Areas (HQTAs):** HQTAs are walkable transit areas within one half-mile of a well- serviced transit stop or a transit corridor. Like TPAs, these HQTAs represent a small percentage of the region’s area but are projected to accommodate most new households.
- **Neighborhood mobility area (NMAs):** NMAs are PGAs with robust residential to non-residential land use connections, high roadway intersection densities and low-to moderate traffic speeds. NMAs support the principles of center focused placemaking and on creating, improving, restoring, and enhancing connections between different work and community destinations.
- **Livable Corridors:** The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors. Growth at strategic nodes along key corridors, many of which are within HQTAs, make transit a more convenient and viable option. The Livable Corridors strategy is comprised of three components - transit improvements; active transportation improvements, and land use policies that promote mixed-use, walkable retail centers at key nodes.

The Project would be consistent with these applicable PGA categories, as it would be a transit-supported mixed-use development in a TPA, HQTA, and MNA as further discussed in **Table 3-4: Consistency with SoCal Connect Land Use Tools**.

Density and Building Intensity

Connect SoCal does not identify specific density or building intensities, but rather builds upon the Place Types defined in the *2020–2045 RTP/SCS*. As noted above, the Project Site is within an area designed as “Urban.” SCAG’s Scenario Planning Model (SPM) Technical Report Appendix defines Place Types that include general descriptions of densities and intensities. The Urban Mixed Use place type is defined as districts exemplified by a variety of intense uses and building

types that are typically between 10 and 40+ stories tall with a floor area ratio (FAR) of approximately 9.0. The Project is generally consistent with this Place Type.

Applicable Policies

Connect SoCal identifies goals, land use strategies and land use tools to guide development in the region. As shown in **Table 3-1: Consistency with Connect SoCal Goals**, **Table 3-2: Consistency with Connect SoCal Principles**, **Table 3-3: Consistency with Connect SoCal Land Use Strategies**, and **Table 3-4: Consistency with Connect SoCal Land Use Tools**, the Project would be consistent with strategies and tools of the 2020–2045 RTP/SCS.

**TABLE 3-1
CONSISTENCY WITH CONNECT SOCIAL GOALS
(2020-2045 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITY STRATEGY)**

Goals	Consistency Analysis
Goal 1: Encourage regional economic prosperity and global competitiveness	Not Applicable. This Goal is directed towards actions taken by SCAG and the City and does not apply to the Project.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. The Project Site is located in an urbanized area in the City within a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA). The Project would provide new residential units that would be well served by mass transit with frequency of service intervals of 15 minutes or less during peak commute periods. The location of the Project encourages a variety of transportation options and access.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	Not Applicable. While not necessarily applicable to an individual development project, the Project would support this goal by improving the viability of alternative forms of transportation through providing higher density development within a Transit Priority Area. A robust variety of transportation options help to ensure the mobility needs of residents and visitors are met.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	Consistent. While not necessarily applicable to an individual development project, the Project would support this goal by improving local access to alternative forms of transportation, with appropriate design considerations to account for future population growth and multimodal choices.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	Consistent. The Project would place new residential units in a HQTA and a TPA. The Project Site location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. Further, the Project would activate the street frontages of the proposed buildings and introduce new landscaping and plaza areas, encouraging pedestrian activity.
Goal 6: Support healthy and equitable communities.	Consistent. The Project would place new residential units in a HQTA and a TPA. The Project Site’s location near mass transit and proximity to services, retail stores, parks, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which include walking, and bicycle and

3.0 Sustainable Communities Environmental Assessment Criteria

Goals	Consistency Analysis
	public transportation use. By promoting pedestrian activity, the Project supports the development of a healthy and equitable community.
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	Consistent. This policy is directed towards SCAG actions to support regional development patterns areas. However, the Project is an infill development within a HQTa and a TPA, which is consistent with this policy. In regard to adaptation to a changing climate, the Project would comply with the California Green Building Standards Code (CALGreen) and the City's Green Building Code.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Not Applicable. This policy is directed towards SCAG actions to leverage the use of new transportation technologies using data-driven solutions. However, as stated above, the Project is an infill development within an HQTa and a TPA.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	Consistent. The Project would provide a range of residential unit types in an urbanized area in the City that offers multiple transportation options.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	Not Applicable. The Project is proposed on an infill development site in an urbanized area and would not directly or indirectly affect any natural or agricultural lands.

Source: SCAG, *Connect SoCal, 2020–2045 RTP/SCS, September 2020.*

**TABLE 3-2
CONSISTENCY WITH CONNECT SOCIAL PRINCIPLES**

Principles	Consistency Analysis
Principle 1. Base transportation investments on adopted regional performance indicators and MAP- 21/FAST Act regional targets.	Not Applicable. This principle directs SCAG in allocating transportation investments. This principle does not apply to the individual development projects such as the Project.
Principle 2. 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	Not Applicable. This principle directs SCAG in allocating transportation system funding.
Principle 3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities	Consistent. The Project is urban infill near mass transit and proximity to services, commercial uses, and employment opportunities. It would promote a more pedestrian-friendly environment and promote the use of a variety of transportation options.
Principle 4. Encourage RTP/SCS investments and strategies that collectively result in reduced nonrecurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices	Not Applicable. This principle is directed at investment in transportation technology and transportation choices and does not apply to development projects such as the Project.

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Principles	Consistency Analysis
Principle 5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions	Consistent. The project would increase housing options in Downtown Los Angeles and in proximity to transit such that residents would reduce vehicle trips and associated regional and localized air pollutant and GHG emissions, which would support the goals of public health.
Principle 6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies	Not Applicable. This principle is directed towards SCAG and the City of Los Angeles and not does apply to individual projects such as the Project.
Principle 7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience	Not Applicable. SCAG and its member agencies are responsible for transportation investments and ensuring that they reflect the best-known science regarding climate change vulnerability and does not apply to individual projects such as the Project.

Source: SCAG, Connect SoCal, 2020–2045 RTP/SCS, September 2020.

**TABLE 3-3
CONSISTENCY WITH CONNECT SOCIAL LAND USE STRATEGIES**

Strategies	Consistency Analysis
Sustainable Community Strategy 1: Focus Growth Near Destinations and Mobility Options	
Sustainable Community Strategy 1a: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	Consistent. The Project would be located within walking distance of work, education, retail, transit, and other destinations.
Sustainable Community Strategy 1b: 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	Consistent. The Project provides greater housing opportunities within downtown Los Angeles and within walking distance of transit.
Sustainable Community Strategy 1c: Plan for growth near transit investments and support implementation of first/last mile strategies	Consistent. The Project provides for growth near transit investments such as Metro Pico Station, approximately 0.25 miles west of the Project site.
Sustainable Community Strategy 1d: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	Not Applicable. The Project is not an underperforming retail development or outmoded nonresidential use.
Sustainable Community Strategy 1e: Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	Consistent. The Project is infill by creating additional development on the site of an existing parking lot in Downtown Los Angeles.
Sustainable Community Strategy 1f: Encourage design and transportation options that reduce the reliance on number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	Consistent. The Project increases the density and mix of uses on the site and provides new housing options within Downtown Los Angeles.

3.0 Sustainable Communities Environmental Assessment Criteria

Strategies	Consistency Analysis
<p>Sustainable Community Strategy 1g: Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).</p>	<p>Consistent. The Project would provide bicycle parking to reduce automobile parking.</p>
<p>Sustainable Community Strategy 2: Promote Diverse Housing Choices</p>	
<p>Sustainable Community Strategy 2a: Preserve and rehabilitate affordable housing and prevent displacement.</p>	<p>Not Applicable. The Project Site does not contain existing housing and therefore would not displace any existing housing or residents.</p>
<p>Sustainable Community Strategy 2b: Identify funding opportunities for new workforce and affordable housing development.</p>	<p>Not Applicable. This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 2c: Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.</p>	<p>Not Applicable. This strategy is directed toward SCAG and local jurisdictions. In addition, the Project Site does not contain accessory dwelling units.</p>
<p>Sustainable Community Strategy 2d: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.</p>	<p>Not Applicable. This strategy relates to jurisdictional policies for supporting housing development and is not applicable at the Project level. However, as infill development in a Transit Priority Area, the Project would support the reduction of GHG emissions.</p>
<p>Sustainable Community Strategy 3: Leverage Technology Innovations</p>	
<p>Sustainable Community Strategy 3a: 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>Consistent. The Project would comply with the provisions of the Los Angeles Green Building Code and the CALGreen code which include standards for the provision of electric vehicle charging stations capable of supporting future electric vehicle supply equipment.</p>
<p>Sustainable Community Strategy 3b: 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.</p>	<p>Not Applicable. This strategy addresses technology options to reduce transportation impacts and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 3c: Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation.</p>	<p>Not Applicable. This strategy is directed toward SCAG and local jurisdictions. Nonetheless, the Project would be built in accordance with LAMC requirements that new multi-family residential buildings be solar ready.</p>
<p>Sustainable Community Strategy 4: Support Implementation of Sustainability Policies</p>	
<p>Sustainable Community Strategy 4a: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.</p>	<p>Not Applicable. This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. This strategy addresses pursuing funding to support local sustainable development implementation projects that reduce greenhouse gas emissions.</p>

3.0 Sustainable Communities Environmental Assessment Criteria

Strategies	Consistency Analysis
<p>Sustainable Community Strategy 4b: Support statewide legislation that reduces barriers to new construction and that incentivizes development of new transit corridors and stations.</p>	<p>Not Applicable. This strategy is directed towards SCAG support for statewide legislation and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 4c: 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.</p>	<p>Not Applicable. This strategy is directed towards SCAG support for public finance programs to support sustainable infrastructure and development projects and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 4d: Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.</p>	<p>Not Applicable. This strategy addresses SCAG working with local agencies on sustainability strategies and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 4e: Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.</p>	<p>Not Applicable. This strategy is directed towards SCAG actions and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 4f: Continue to support long range planning efforts by local jurisdictions.</p>	<p>Not Applicable. This strategy is directed towards SCAG actions and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 4g: Provide educational opportunities to local decisionmakers and staff on new tools, best practices and policies relating to implementing the Sustainable Communities Strategy.</p>	<p>Not Applicable. This strategy is directed towards SCAG actions and does not apply to individual development projects.</p>
<p>Sustainable Community Strategy 5: Promote a Green Region</p>	
<p>Sustainable Community Strategy 5a: 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>Not Applicable. This strategy addresses SCAG support of local planning efforts related to community resiliency and does not apply to individual development projects. Nevertheless, the Project represents infill development within highly urbanized Downtown Los Angeles with low vehicle miles travelled, and would avoid development in wildlands, wildfire-prone areas, and greenfield areas.</p>
<p>Sustainable Community Strategy 5b: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.</p>	<p>Not Applicable. This strategy addresses SCAG support for local policies on renewable energy production, reduction of urban heat islands and carbon sequestration and does not apply to individual development projects. Nonetheless, the Project would be in compliance with the California Green Building Code (CALGreen) which requires a solar area on the rooftop of the multifamily residential building.</p>
<p>Sustainable Community Strategy 5c: Integrate local food production into the regional landscape.</p>	<p>Not Applicable. This strategy addresses local food production in the region and does not apply to individual development projects.</p>

3.0 Sustainable Communities Environmental Assessment Criteria

Strategies	Consistency Analysis
Sustainable Community Strategy 5d: Promote more resource efficient development focus on conservation, recycling and reclamation.	Consistent. The Project would comply with the CALGreen for resource efficient building materials and systems.
Sustainable Community Strategy 5e: Preserve, enhance and restore regional wildlife connectivity.	Not Applicable. This policy addresses regional wildlife movement and corridors and does not apply to an urban infill development like the Project.
Sustainable Community Strategy 5f: Reduce consumption of resource areas, including agricultural land.	Consistent. The Project would involve infill development of an existing urban location. By accommodating housing and commercial uses in an urbanized area the Project will reduce the demand to develop resource areas such as agricultural land.
Sustainable Community Strategy 5g: Identify ways to improve access to public park space.	Not Applicable. This strategy addresses access to public park space and does not apply to individual development projects not adjacent to public park space.

Source: SCAG, *Connect SoCal, 2020–2045 RTP/SCS, September 2020.*

**TABLE 3-4
CONSISTENCY WITH CONNECT SOCAL LAND USE TOOLS**

Tools	Consistency Analysis
CENTER FOCUSED PLACEMAKING Creating dynamic, connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG emissions is critical throughout the region.	Consistent. Through urban infill, the Project would create a place for residents to live within one of the major centers of the region with work, play, and many cultural amenities in close proximity. Through convenience to amenities, services and transit, the Project would reduce reliance on single-occupancy vehicles.
PRIORITY GROWTH AREAS Priority Growth Areas (PGAs) follow the principles of center focused placemaking and are locations where many Connect SoCal strategies can be fully realized.	Consistent. The Project is located in a Priority Growth Area as shown in Figure 3-1: Priority Growth Areas.
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. Employment growth and residential growth are prioritized in existing Job Centers in order to leverage existing density and infrastructure.	Consistent. The Project is located in a Job Center as shown in Figure 3-2: Job Centers. Specifically, the Project is located in Downtown Los Angeles. Consistent with this tool, the Project prioritizes residential growth that can be supported by the existing employment density and infrastructure within downtown Los Angeles.
TRANSIT PRIORITY AREAS Transit Priority Areas (TPAs) are Priority Growth Areas that are within one half mile of existing or planned ‘major’ transit stops in the region.	Consistent. The Project is located within a Transit Priority Area as shown in Figure 3-3: Transit Priority Areas. The Project Site is less than one half mile walk to an existing station on the Metro light rail line.

Tools	Consistency Analysis
<p>HIGH QUALITY TRANSIT AREAS High Quality Transit Areas (HQTAs) are corridor-focused Priority Growth Areas within one half 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.</p>	<p>Consistent. The Project is located within a High Quality Transit Priority Area as shown in Figure 3-4: High Quality Transit Areas. The Project Site is less than one half mile walk to an existing station on the Metro light rail line.</p>
<p>NEIGHBORHOOD MOBILITY AREAS Neighborhood mobility areas (NMAs) focus on creating, improving, restoring, and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways, and other destinations. NMAs are Priority Growth Areas with robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds.</p>	<p>Consistent. The Project is located within a Neighborhood mobility area as shown in Figure 3-5: Neighborhood Mobility Areas. Neighborhood mobility areas (NMAs) focus connectivity within a neighborhood by having robust links between residential and non-residential land uses within the neighborhood. As such, NMAs are intended to support “walkability” over vehicular trips. The Project is located in the dense, mixed-use context of the South Park neighborhood. The Project would provide pedestrian connections to the South Park Commons as well as the range of retail, restaurant, and entertainment uses within South Park.</p>
<p>LIVABLE CORRIDORS The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors, and to “redevelop” single-story under-performing retail with well-designed, higher density housing and employment centers. Growth at strategic nodes along key corridors, many of which are within HQTAs, will make transit a more convenient and viable option.</p>	<p>Consistent. The Project is located along a Livable Corridor as shown in Figure 3-6: Livable Corridors. The Project would complete the redevelopment of land around the 11th Street and Olive Street intersection. This growth at a node would provide the density of activity to support transit and other uses along 11th Street.</p>
<p>SPHERES OF INFLUENCE Local Agency Formation Commissions, or LAFCos, are given the authority to determine SOIs for all local governmental agencies, and each county in the SCAG region has an associated LAFCo. An SOI is a planning boundary outside of a local agency’s legal boundary (such as the city limit line) that designates the agency’s probable future boundary and service area.</p>	<p>Not Applicable. The Project is within the City of Los Angeles and is not part of a Sphere of Influence.</p>
<p>GREEN REGION A sustainable, “green” region requires that the built environment and natural resource areas coexist in a well-balanced land use pattern that encourages mutual co-benefits.</p>	<p>Consistent. The Project would create new housing and employment within an area that is a PGA, Job Center, TPA, HQTA and NMA, and away from natural and farmlands on the edges of urban and suburban areas.</p>
<p>TRANSFER OF DEVELOPMENT RIGHTS Transfer of Development Rights (TDR) is a market-based planning tool to support growth in locally identified “receiving districts” in lieu of growth in identified “sending districts.”</p>	<p>Consistent. The Project would utilize the Downtown Los Angeles’s Central Business District “Transfer of Floor Area Rights” (TFAR) program. This program supports targeted growth within the downtown priority growth area while relieving development pressure from landmark “sending” sites.</p>

Tools	Consistency Analysis
<p>URBAN GREENING Urban Greening is a multi-benefit land use strategy that improves the relationship between the built and natural environment.</p>	<p>Consistent. The Project would increase the number of street trees bordering the Project Site from ten (10) to seventeen (17) trees and would provide amenity decks on the roof of the parking podium that would feature ornamental trees, shrubs, and lawn.</p>
<p>GREENBELTS & COMMUNITY SEPARATORS Greenbelts and community separators can serve as contiguous areas between jurisdictions that support projected regional growth, promote land conservation, and avert unchecked urbanization.</p>	<p>Not Applicable. The Project is contained within one existing urban block and thus does not provide opportunities for greenbelts or separators.</p>

Source: SCAG, *Connect SoCal, 2020–2045 RTP/SCS, September 2020.*

Consistency with Criterion 2: **Based on total building square footage, the Project contains at least 50 percent residential use, and if Project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.**

PRC §21155(b)(1) states that a SCEA is only applicable for a Transit Priority Project that contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75. The Project includes the construction of; (1) a total floor area of 491,515 square feet on Site 2 of which there would be 487,337 square feet of residential floor area, which is equivalent to approximately 99 percent of the total floor area, and (2) a total floor area of 608,977 square feet on Site 3 of which there would be 597,700 square feet of residential floor area, which is equivalent to approximately 98 percent of the total floor area. Therefore, the proposed Project meets the residential floor area criteria for a SCEA.

Consistency with Criterion 3: **The Project includes a minimum net density of at least 20 dwelling units per acre.**

PRC §21155(b) states a SCEA is only applicable for a Transit Priority Project that provides a minimum net density of at least 20 units per acre. The Site 2 Development includes 536 new multifamily residential units within a site of approximately 0.8 acres (approximately 670 units/acre). The Site 3 Development includes 713 new multifamily residential units within a site of approximately 1.1 acres (approximately 648 units/acre). Therefore, the proposed Project meets the residential density criteria for a SCEA.

Consistency with Criterion 4: **The Project Site is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020–2045 RTP/SCS.**

PRC §21155(b)(3) states a SCEA is only applicable for a Transit Priority Project that is within one-half mile of a major transit stop or a high-quality transit corridor. A major transit stop is defined in

PRC §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.” A high-quality transit corridor is defined in PRC §21155(b)(3) as “a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.”

As listed in Section 2.5 above, the Project Site is within 0.25 miles of the Metro Pico Station, which serves the Metro A (Blue) Line and Metro E (Expo) Line. As such, the Project is within one-half mile of a major transit stop. In addition, the Project Site is served by multiple bus lines. Six Metro Rapid lines, which have service intervals of less than 15 minutes during peak commute hours, have stops within one-quarter of a mile of the Project Site. As such, the Project is also within a high-quality transit corridor. Therefore, the proposed Project is consistent with this criterion for a SCEA.

3.3 SB 375 STREAMLINING BENEFITS

Pursuant to Public Resources Code, Section §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC Section 21081, shall be eligible for either the provisions of subdivision (b) (sustainable communities’ environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a SCEA, which provides streamlining benefits.

PRC Section §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports. Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable. As such streamlining benefits include:

1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC Section §21155.2(b)(1));
2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC Section §21159.28(a));
3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC Section §21159.28(a); and

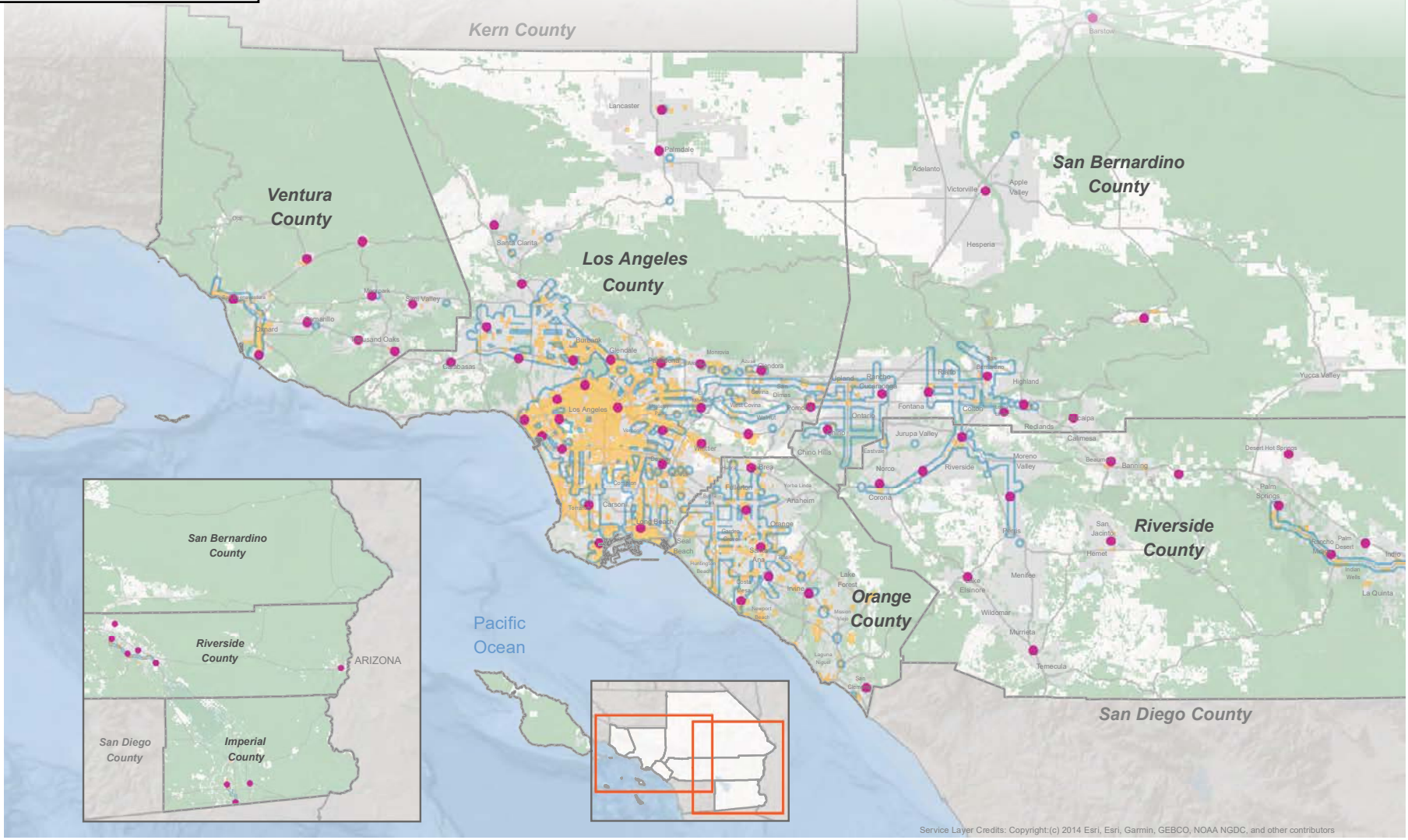
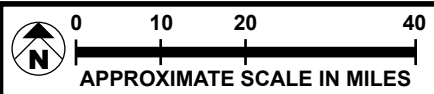
4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (Public Resources Code Section 21159.28(b)).

The City of Los Angeles, Department of City Planning would incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

3.4 SCOPE OF ANALYSIS

Pursuant to PRC Section §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, this SCEA analyzes the following topics:

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



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- Priority Growth Areas vs. Regional Growth Constraints**
- Job Center
 - Neighborhood Mobility Areas
 - High Quality Transit Area
 - Regional Growth Constraints

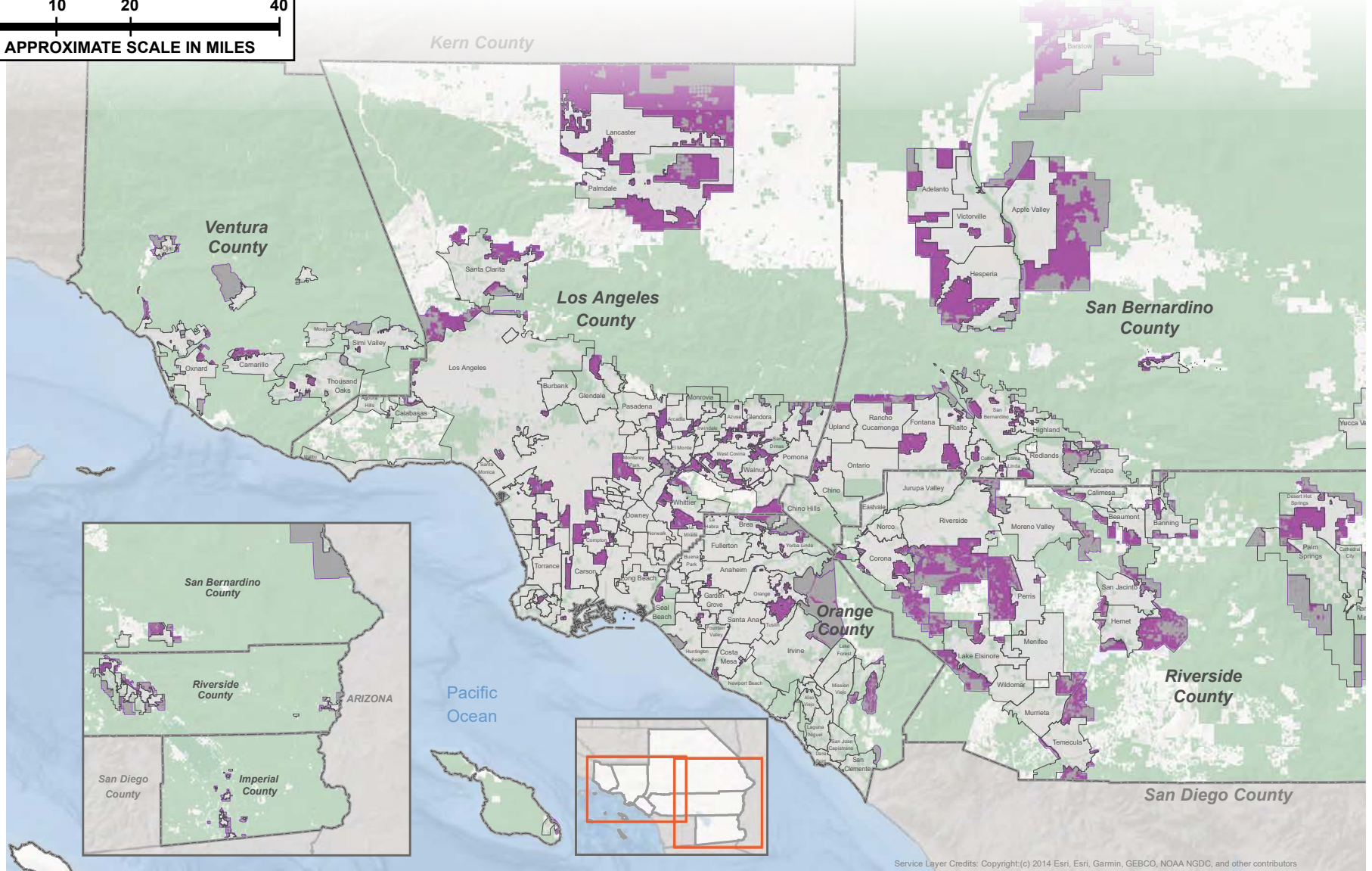
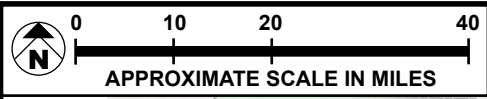
Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

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

FIGURE 3-1a



Priority Growth Areas



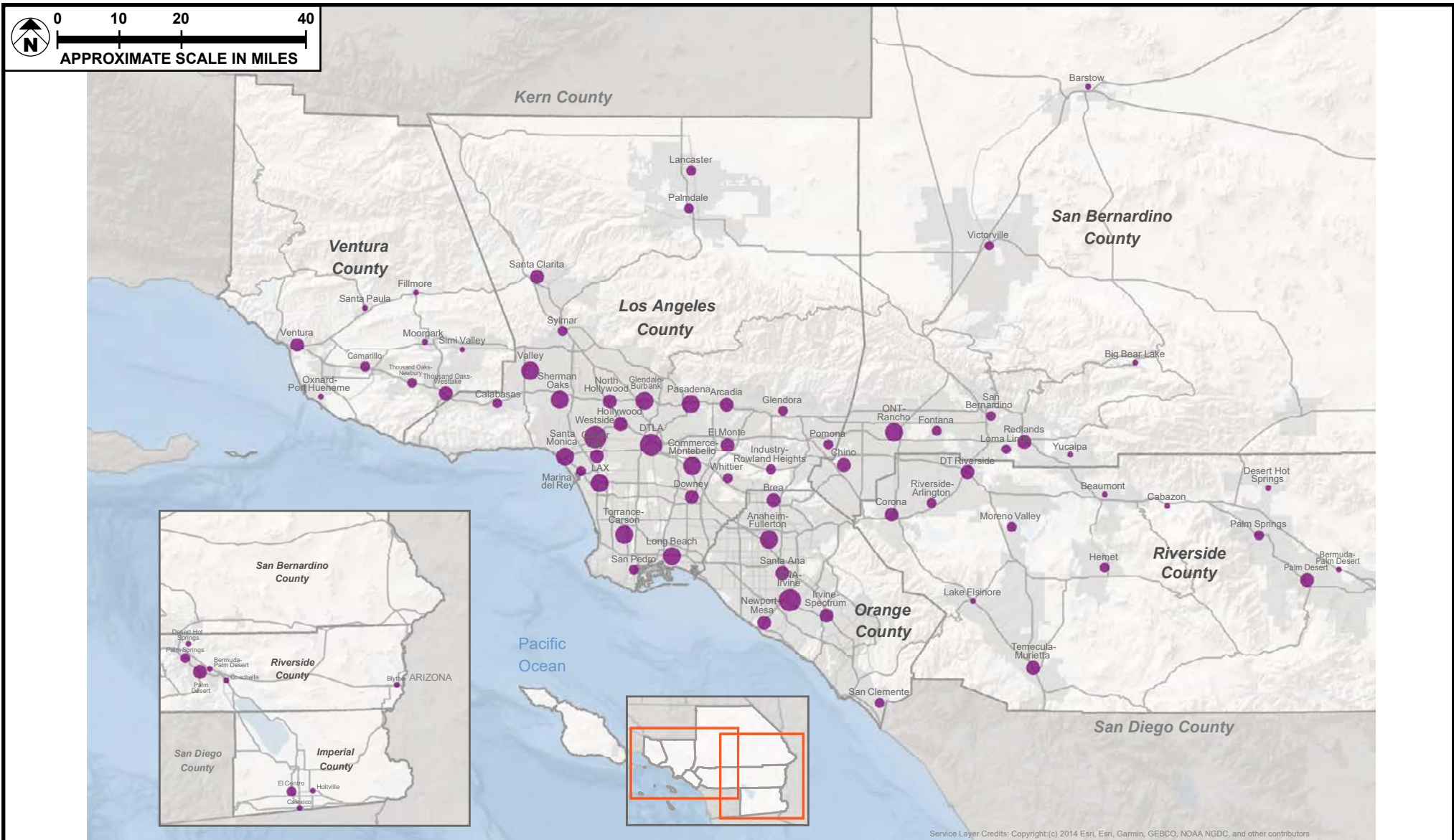
- County Boundaries
- Sphere of Influence
- City Boundaries
- Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

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

FIGURE 3-1b



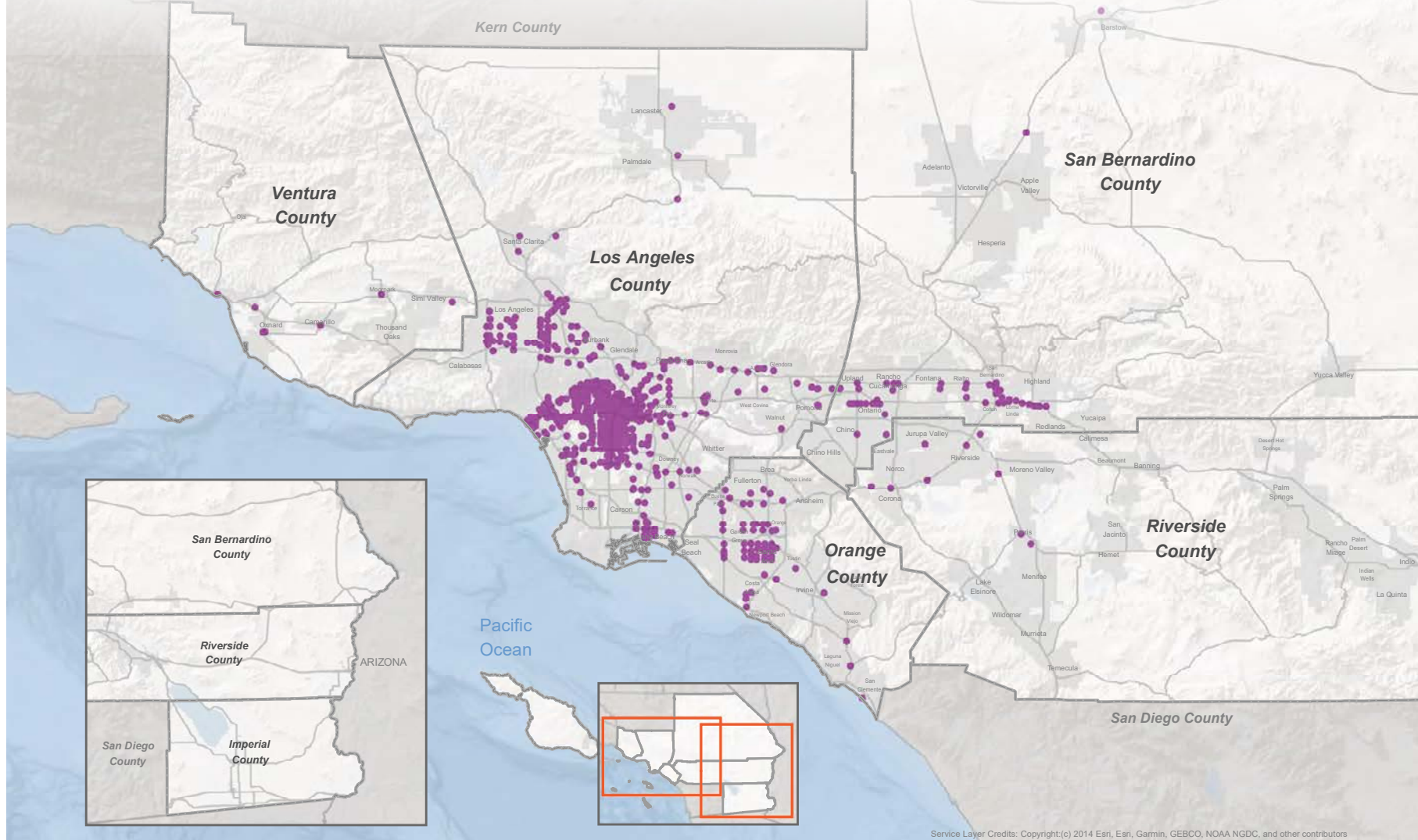
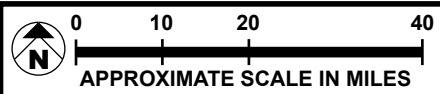
SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

- 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)

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.

Source: SCAG, 2019

FIGURE 3-2



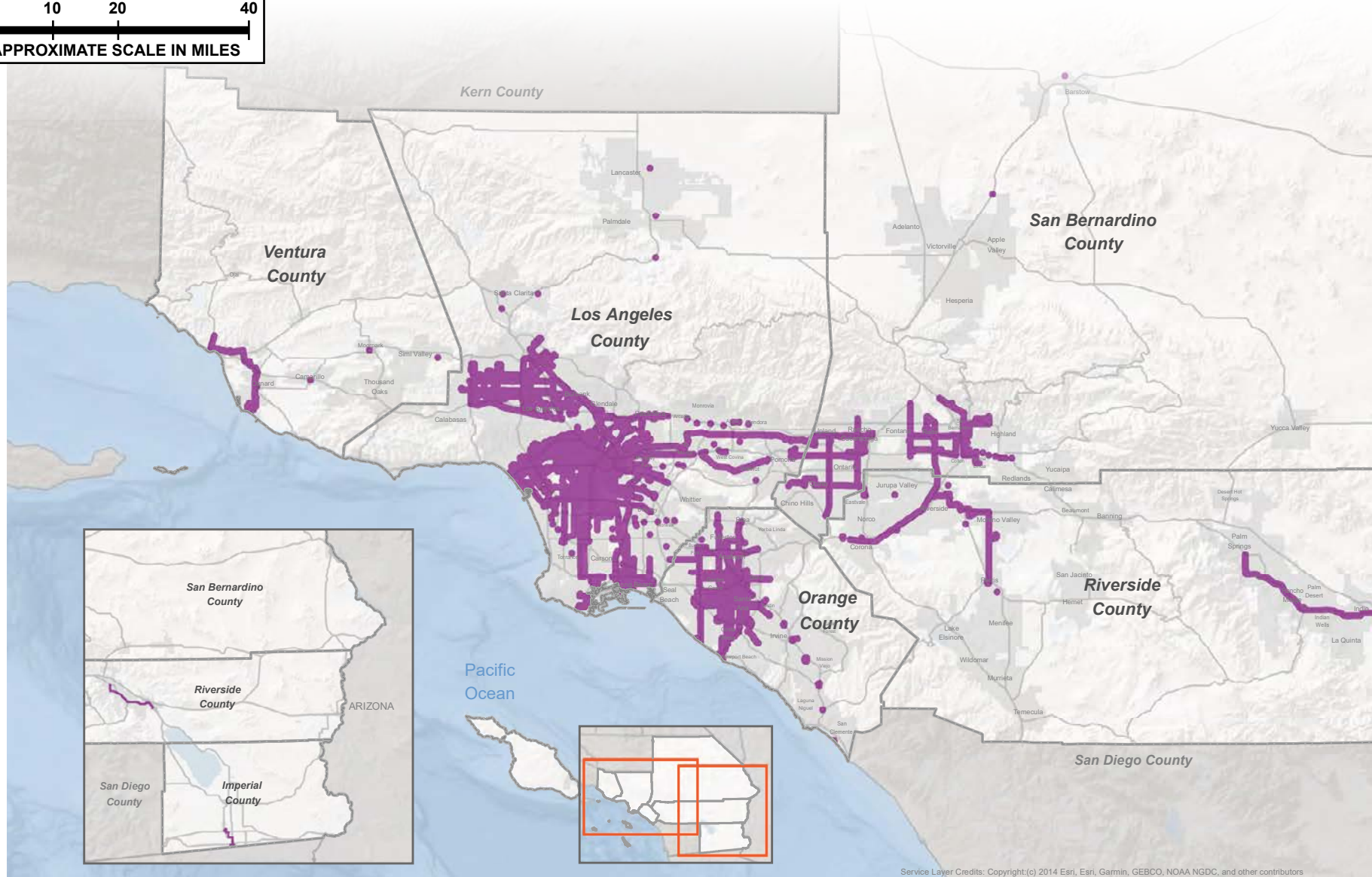
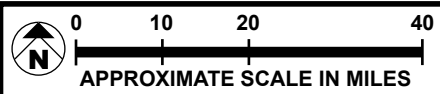
Transit Priority Areas (2045)

■ TPA

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.

Source: County Transportation Commissions, SCAG, 2019

FIGURE 3-3



Service Layer Credits: Copyright:(c) 2014 Esri, Esri, Garmin, GEBCO, NOAA NGDC, and other contributors

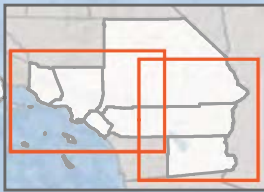
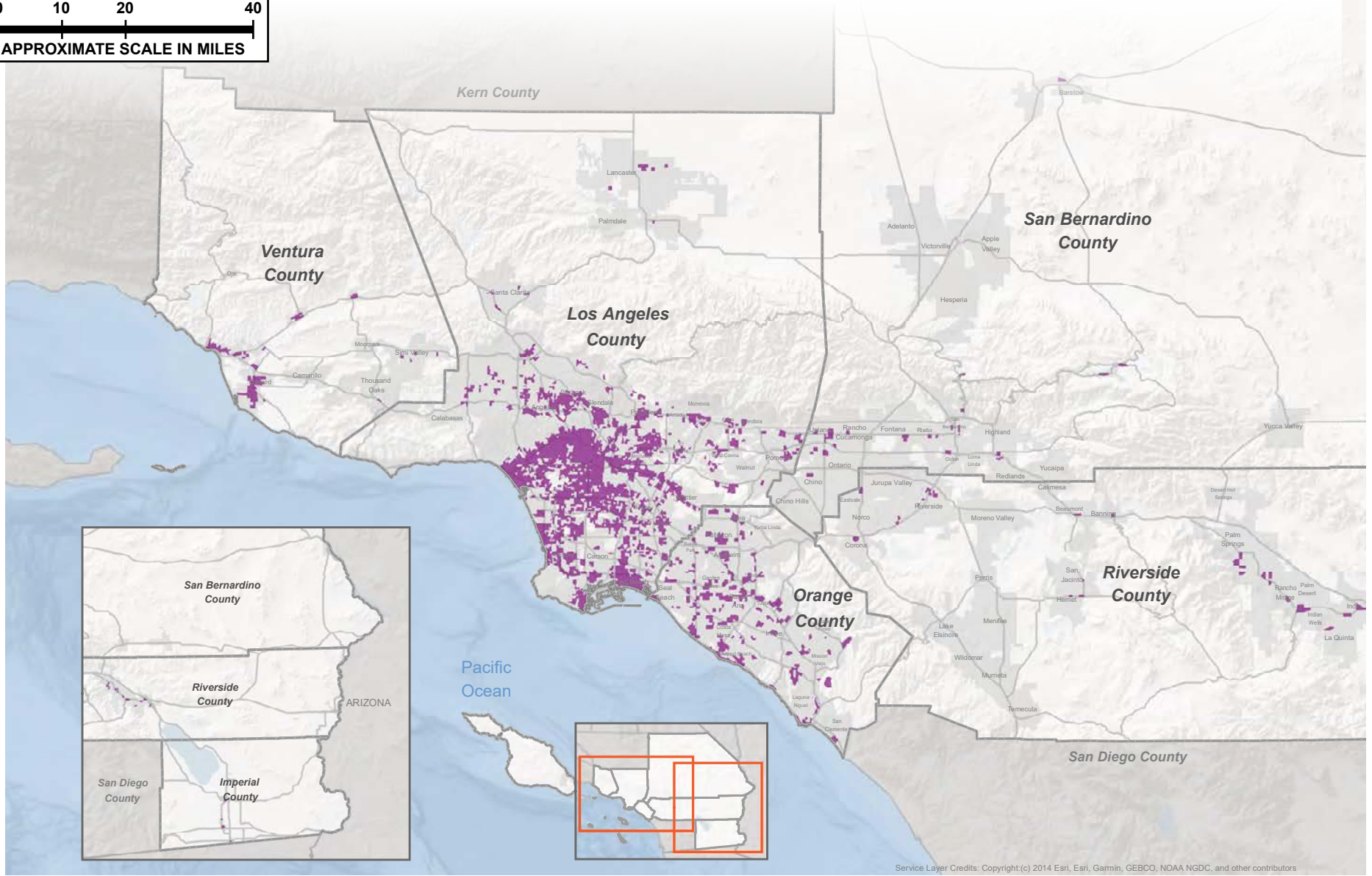
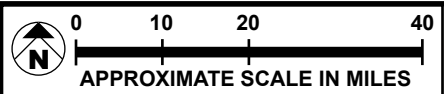
High Quality Transit Areas (2045)

■ HQTA


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 HQTCs using the methodology described in the Transit Technical Report. Major transit stops and HQTCs are extracted from 2045 plan year data of Connect SoCal.

Source: County Transportation Commissions, SCAG, 2019

FIGURE 3-4



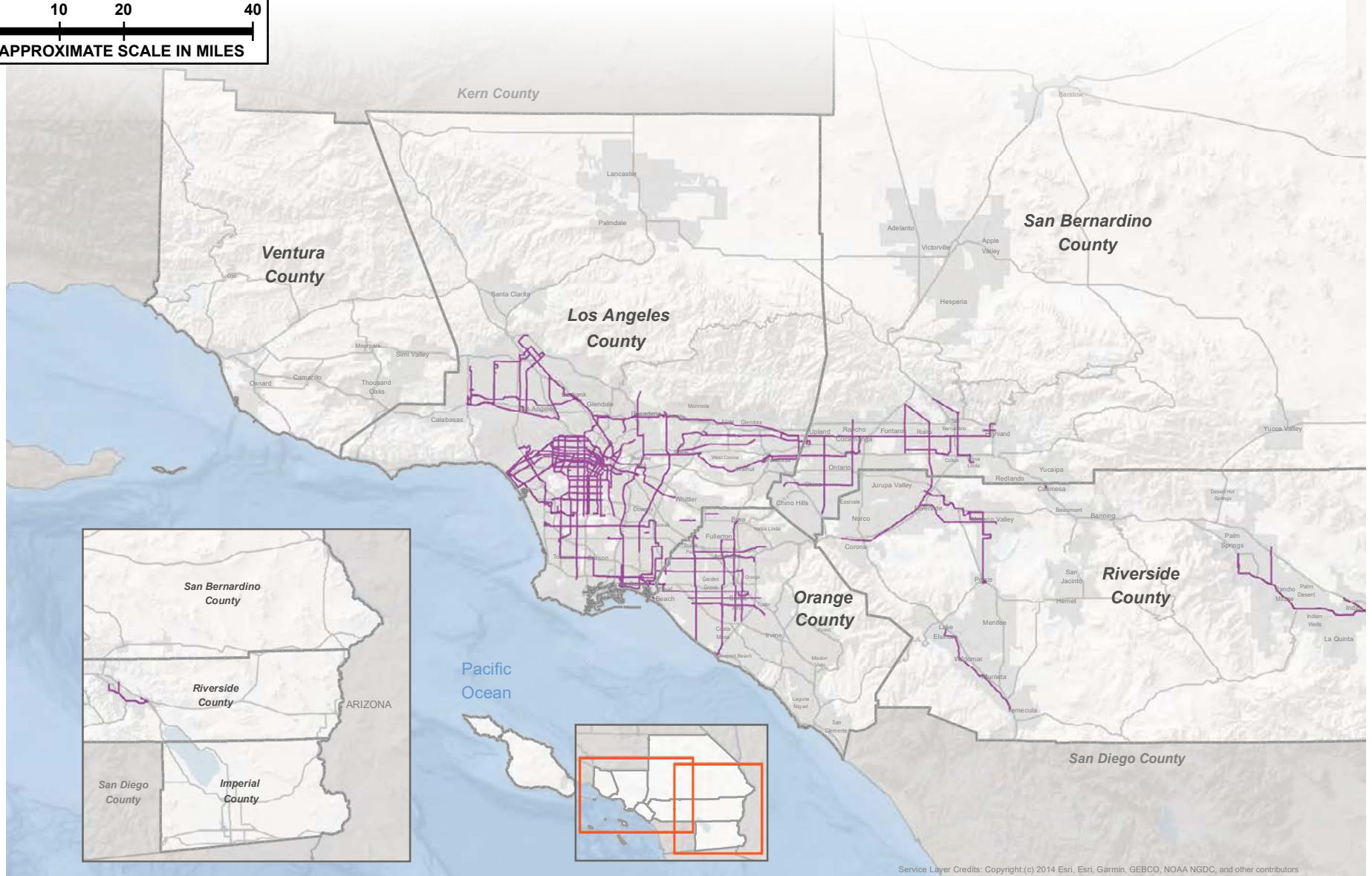
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Neighborhood Mobility Areas (NMA)
 NMA


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.

Source: SCAG, 2019

FIGURE 3-5



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Livable Corridors
 Livable Corridors

Source: SCAG, 2019

FIGURE 3-6



Livable Corridors

4.0 INCORPORATION OF MITIGATION MEASURES, PERFORMANCE STANDARDS, AND CRITERIA FROM PRIOR APPLICABLE EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The applicable EIR in this case would be the *Connect SoCal 2020–2045 RTP/SCS Program Environmental Impact Report* (RTP/SCS PEIR) for Southern California Association of Governments (SCAG).

The Mitigation Monitoring and Reporting Program for the *Connect SoCal 2020–2045 RTP/SCS PEIR* (SCAG MMRP) does not include project-level mitigation measures that are required of the Project. Rather, the SCAG MMRP provides a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The SCAG measures are not prescriptive on the Project unless the lead agency determines their applicability to the Projects based on the circumstances and anticipated environmental impacts.

The SCAG MMRP identified programmatic mitigation measures to be implemented by SCAG and identifies project-level mitigation measures that SCAG will encourage local agencies to implement, as appropriate and feasible, as part of project-specific environmental review. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the *Connect SoCal 2020–2045 RTP/SCS PEIR* as appropriate to address project-specific conditions.

To comply with PRC Section 21155.2, applicability of the mitigation measures contained in the SCAG MMRP to the Project are shown in **Table 4-1: Applicability of Project-Level Mitigation Measures from Connect SoCal (2020-2045 Regional Transportation Plan / Sustainable Communities Strategy)**.

TABLE 4-1
APPLICABILITY OF PROJECT-LEVEL MITIGATION MEASURES FROM CONNECT SOCIAL
(2020-2045 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITIES STRATEGY)

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Aesthetics		
Scenic Vistas.	<p>PMM AES-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated; as set forth in PRC Section 21099, enacted by Senate Bill 743, and the City’s Zoning Information (ZI) File No. 2452, the “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.” As described previously in this section, the Project meets these statutory criteria.</p> <p>In addition, the Project would meet the requirements set forth in Los Angeles Municipal Code (LAMC) Section 91.8104 by ensuring that every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition in good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation, or other similar material. The Project would also be designed in accordance with City Ordinance No. 170,978, Landscape Ordinance Guidelines.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<ul style="list-style-type: none"> 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). 	
Visual Character.	<p>PMM AES-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>This mitigation measure is not incorporated; as set forth in PRC Section 21099, enacted by Senate Bill 743, and the City’s Zoning Information (ZI) File No. 2452, the “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.” As described previously, the Project meets these statutory criteria.</p> <p>In addition, the Project would meet the requirements set forth in Los Angeles Municipal Code (LAMC) Section 91.8104 by ensuring that every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition in good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation, or other similar material. The Project would also be designed in accordance with City Ordinance No. 170,978, Landscape Ordinance Guidelines.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>setback buffers, landscaping, color, texture, signage, and lighting criteria.</p> <p>d) Design projects consistent with design guidelines of applicable general plans.</p> <p>e) Require that sites be kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.</p> <p>f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows:</p> <ul style="list-style-type: none"> – 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; <p>g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.</p>	

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Light, glare, shade.	<p>PMM AES-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. 	<p>This mitigation measure is not incorporated; as set forth in PRC Section 21099, enacted by Senate Bill 743, and the City’s Zoning Information (ZI) File No. 2452, the “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.” As described previously, the Project meets these statutory criteria.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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	<ul style="list-style-type: none"> i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. 	
Agriculture and Forestry		
Conversion of farmland or forest land.	<p>PMM AG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 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. 	<p>This mitigation measure is not incorporated because the Project Site neither contains nor is located near any agricultural resources. The Project is located in a highly urbanized, infill location in Downtown Los Angeles currently improved with surface parking lots. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance exists on or in the vicinity of the Project Site. No substantial adverse effects related to agriculture and forestry resources would occur. As such, it is not necessary to incorporate this Mitigation Measure.</p>

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	<ul style="list-style-type: none"> f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. 	
Zoning for Ag use, Williamson Act Contract.	<p>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:</p> <ul style="list-style-type: none"> a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.) or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. 	This mitigation measure is not incorporated because the Project Site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act contracts in effect for the Project Site.
Construction Equipment.	<p>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:</p> <ul style="list-style-type: none"> a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources. 	This mitigation measure is not incorporated as there is no farmland at or near the Project Site. The Project Site and surrounding vicinity are not zoned for agriculture, forest land, or timberland.

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Minimize loss of farmland or forest lands.	<p>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:</p> <ul style="list-style-type: none"> 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. 	This mitigation measure is not incorporated because there is no farmland or forestland at or near the Project Site; therefore, no farmland or forest land will be lost or converted to non-agricultural uses.
Invasive species.	<p>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</p>	This mitigation measure is not incorporated because the Project Site is currently not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land will be converted to non-forest uses. Thus, none of the mitigation measures that pertain to

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	<p>appropriate by each Lead Agency, may include the following, or other comparable measures:</p> <p>a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.</p>	<p>agriculture and forestry resources are applicable to the Project.</p>

Air Quality

<p>Violation of air quality standards.</p>	<p>PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Minimize land disturbance.</p> <p>b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</p> <p>c) Cover trucks when hauling dirt.</p> <p>d) Stabilize the surface of dirt piles if not removed immediately.</p>	<p>The mitigation measure is not incorporated because the Project will comply with existing regulations that have been identified and are required by the Southern California Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) to facilitate consistency with plans for attainment for the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), as applicable and feasible. Adherence to the following requirements by SCAQMD, CARB, the State of California, and the federal government, and that have been identified in Section 5.0 in the summary of Regulatory Compliance Measures, would further ensure consistency with PMM-AQ-1.</p> <p>Compliance with the existing regulations identified below would facilitate consistency with plans for attainment of air quality standards identified by</p>
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	<ul style="list-style-type: none"> 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 	<p>SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1.</p> <p>RCM AQ 1: Consistent with SCAQMD Rule 401 and CARB’s In-use Off-road Diesel-Fueled Fleets Regulation, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> – Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers’ specifications. – All diesel-powered off-road construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency (USEPA) Tier 4 or higher emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine. – All diesel-powered construction equipment shall use CARB Level 2 or higher diesel particulate filters. – When possible, electricity shall be utilized from power supply sources rather than temporary gasoline or

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	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.	diesel power generators, as feasible.
	n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.	RCM AQ 3: Rule 402 (Nuisance). This rule states 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 to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
	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.	RCM AQ 2: Rule 403 (Fugitive Dust). This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. BACMs may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site-access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).
	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	RCM-AQ-3: Rule 1113 (Architectural Coatings). This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance

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	<p>by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer’s recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.</p> <p>r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.</p> <p>s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.</p> <p>t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air</p>	<p>coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.</p> <p>RCM-AQ-4: In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.</p> <p>RCM-AQ-5: In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.</p>

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	<p>Ranger Education (CARE), and Why Air Quality Matters programs.</p> <p>u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).</p> <p>v) As applicable for airport projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – 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. – Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. – 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. <p>w) As applicable for port projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). – Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. – 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. 	

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	<ul style="list-style-type: none"> – Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. – 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. – Encourage the participation in the Green Ship Incentives. – Offer incentives to encourage the use of on-dock rail. 	
	<p>x) As applicable for rail projects, the following measures should be considered:</p> <ul style="list-style-type: none"> – 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. 	
	<p>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.</p>	
	<p>z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.</p> <ul style="list-style-type: none"> – 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 	

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	<p>air filtration systems when windows are open or residents are outside.</p> <ul style="list-style-type: none"> – Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. – Disclose the potential increase in energy costs for running the HVAC system to prospective residents. – Provide information to residents on where MERV filters can be purchased. – Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. – Identify the responsible entity such as future residents themselves, Homeowner’s Association, or property managers for ensuring enhanced filtration units are replaced on time. – Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. – Set criteria for assessing progress in installing and replacing the enhanced filtration units; and – Develop a process for evaluating the effectiveness of the enhanced filtration units. <p>aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p> <p>bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:</p>	

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	<ul style="list-style-type: none"> <li data-bbox="632 237 1220 415">– 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%. <li data-bbox="632 440 1220 553">– 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%. <li data-bbox="632 578 1220 634">– Nonroad diesel engines on site shall be Tier 2 or higher. <li data-bbox="632 659 1220 927">– 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. <li data-bbox="632 951 1220 1040">– Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. <li data-bbox="632 1065 1220 1203">– 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. <li data-bbox="632 1227 1220 1346">– 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: 	

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	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> – 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: <ul style="list-style-type: none"> 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: 	

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	<ol style="list-style-type: none"> 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) 	
	<p>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:</p> <ul style="list-style-type: none"> – 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 <i>Energy Star and Other Climate Protection Partnerships</i> 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 	

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	<p>shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.</p> <ul style="list-style-type: none"> – Provide traffic calming measures, such as: <ul style="list-style-type: none"> i. Marked crosswalks 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: <ul style="list-style-type: none"> 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: 	

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	<ul style="list-style-type: none"> 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. 	

Biological Resources

<p>Candidate, sensitive, or special-status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances. Protection of biological resources. HCP, NCCP or other conservation plans.</p>	<p>PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. Impact minimization strategies 	<p>This mitigation measure is not incorporated because the Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City and consists of improved paved surface parking lots. The Project would not be developed on open space, and development of the Project would not result in adverse effects to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or the California Native Plant Society. It would also not result in any adverse effects to any occupied habitat, potentially suitable habitat, or designated critical habitat. As such, this mitigation measure is not applicable.</p> <p>The Project will substantially conform with this mitigation measure, as it would comply with the following regulatory measures, identified in Section 5.0 in the summary of <i>Regulatory Compliance Measures</i>:</p>
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	<ul style="list-style-type: none"> 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. 	<p>RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.</p> <p>RCM-BIO-2: Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:</p> <ul style="list-style-type: none"> • Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within

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	<ul style="list-style-type: none"> 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. 	<p>500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.</p> <ul style="list-style-type: none"> • If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31. • Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. • The Applicant shall record the results of the recommended

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Riparian or other sensitive natural community.	<p>PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.</p> <p>This mitigation measure is not incorporated because the Project Site does not contain any riparian habitat or support any species identified or designated as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The Project Site is located in an urbanized area of the City and consists of improved paved surface parking lots. The Project would replace the existing surface parking lots on the Project Site. The Project would not be developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. As such, this mitigation measure is not applicable.</p>

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	<p>protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <p>d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.</p> <p>e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.</p> <p>f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.</p> <p>g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.</p> <p>h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.</p> <p>i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.</p>	

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	<ul style="list-style-type: none"> 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 to 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 	

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	<p>and replacement with more ecologically valuable native species).</p> <p>r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</p>	
Wetlands and water features subject to federal or state jurisdiction.	<p>PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.</p> <p>a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.</p> <p>b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.</p> <p>c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic</p>	This mitigation measure is not incorporated because the Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies. As such, this mitigation measure is not applicable.

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	<p>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:</p> <ul style="list-style-type: none"> – 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 <p>d) Where avoidance is determined to be infeasible and proposed projects’ impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead</p>	

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	<p>agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:</p> <ul style="list-style-type: none"> – Avoidance – Impact Minimization – On-site alternatives – Off-site alternatives <p>e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.</p>	
Wildlife movement.	<p>PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>This mitigation measure is not incorporated, because the Project Site is located in a developed, urban area and the Project would replace the existing surface parking lots. The Project Site is surrounded by other existing urban uses including office, retail establishments, hotels, restaurants, and multi-family residences. Therefore, the Project would not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. Thus, development of the Project Site would not interfere with the movement of any native resident or migratory fish or wildlife species; with established native resident or migratory wildlife corridors; or impede the use of native wildlife nursery sites. For these reasons, this mitigation measure is not applicable.</p>

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	<p>important for wildlife movement related to local ordinances or conservation plans.</p> <p>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.</p> <p>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 the Project Site from February 1 through August 31.</p> <p>e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.</p> <p>f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.</p> <p>g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.</p> <p>h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site.</p> <p>i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points</p>	

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	<p>that could reduce function of recognized movement corridor.</p> <p>j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.</p> <p>k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).</p> <p>l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.</p> <p>m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.</p> <p>n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</p> <p>o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, where applicable:</p>	

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	<ul style="list-style-type: none"> – 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>p) Where the lead agency has identified that an 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.</p>	
	<p>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.</p>	
	<p>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.</p>	
	<p>s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> – Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. 	

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	<ul style="list-style-type: none"> – 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. 	
	<p>t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:</p> <ul style="list-style-type: none"> – 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 is 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 	

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	<p>from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <ul style="list-style-type: none"> – 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. <p>u) Require large buffers between sensitive uses and freeways.</p> <p>v) Create corridor redundancy to help retain functional connectivity and resilience.</p>	

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Local policies or ordinances protecting biological resources.	<p>PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 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 	<p>This mitigation measure is not incorporated because the Project will comply with existing regulations adopted by the City addressing removal of existing trees.</p> <p>The Project Site is located in a developed, urban area. The Project would not be developed on existing open space or sensitive habitat. The Project Site does not contain any trees or shrubs subject to protection under the City’s Protected Tree Ordinance.</p> <p>The Project Site contains 11 non-protected street trees that would be replaced with 243 trees on the Project Site. The Project will comply with the regulatory measures identified in Section 5.0 in the summary of <i>Regulatory Compliance Measures</i>, including complying with the City’s tree removal ordinances (identified above as RCM Bio-1) with the MBTA (identified above as RCM Bio-2). These Regulatory Compliance Measures are comparable to this mitigation measure, and, for this reason, this mitigation measure is not incorporated into the Project.</p>

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	<p>in place for duration of all such work. Clearly mark all trees to be removed.</p>	
	<p>e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.</p>	
	<p>f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.</p>	
	<p>g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.</p>	

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	<p>h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources.</p> <p>i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:</p> <ul style="list-style-type: none">– 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.	

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Consistency with applicable HCPs and NCCPs.	<p>PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Furthermore, the Project Site is not within or adjacent to any existing Significant Ecological Area. As such, this mitigation measure is not applicable.</p>

Cultural Resources

Historical and archaeological resources	<p>PMM CULT-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>This mitigation measure is incorporated to avoid potential impacts to any subsurface cultural resources that may be present on the Project Site that could be disturbed during construction of the Project.</p> <p>The Project Site does not contain historic resources and there are no historic resources on adjacent sites. Since all new construction associated with the Project would be contained within the Project Site, and the Project Site</p>
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	<p>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.</p> <p>b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior’s (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center.</p> <p>c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following:</p> <ul style="list-style-type: none"> – 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 	<p>does not contain any historic resource or resources, the Project would not physically alter or demolish any historical resources located on or adjacent to the Project Site.</p> <p>Consistent with PMM CULT-1 (j) because the Project Site is developed and no natural ground surface is exposed, sensitivity for subsurface resources was assessed based on archaeological desktop assessment. This assessment included conducting archeological records and sacred lands file searches consistent with PMM CULT-1 (f) and (g).</p> <p>The desktop assessment of the Project area determined there are no previously recorded resources documented within the Project area. However, the initial records search indicated there may be the potential for the Zanja system to extend into the Project area. Although there is insufficient evidence to make a precise conclusion on the position of the Zanja system in relation to the Project Site, a review of available data indicated that the possibility of encountering portions of Zanja system within the Project area on the east side of Olive Street (1100 Olive Street, Site 3) appears to be very low. There does appear to be a potential for encountering portions of and/or artifacts or features associated with the Zanja system on the west side of Olive Street (1105 Olive Street, Site 2) during construction.</p> <p>Consistent with PMM CULT-1 (j) an archaeological monitor will be retained to observe all ground disturbing activities and if any cultural resources, including any indications of the Zanja Madre are encountered, construction activities and excavation in the area where cultural resources are found will be stopped until a qualified archaeologist can determine whether these resources are significant consistent with PMM CULT-1 (l) and appropriately addressed.</p>

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	<p>Buildings. If resources would be impacted, impacts should be minimized to the extent feasible.</p> <ul style="list-style-type: none"> – Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. <p>d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior’s Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.</p> <p>e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS</p>	

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	<p>collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency.</p> <p>f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified.</p> <p>g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information.</p> <p>h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys.</p>	

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	<p>i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p>	

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

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	<p>affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinterment in an area designated by the tribe.</p>	
Human remains	<p>PMM CULT-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required.</p> <p>b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional:</p> <ul style="list-style-type: none"> – 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 	<p>This mitigation measure is not incorporated because the Project will comply with existing regulatory measures determined to be equal to or more effective than PMM CULT-2 to ensure there would be no impacts pertaining to the unanticipated identification of human remains.</p> <p>In addition, the Project would comply with regulatory measures that have been identified in Section 5.0 in the summary of <i>Regulatory Compliance Measures</i>, as follows:</p> <p>RCM-CR-1. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> • Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays) • If the remains are determined to be of Native American descent, the

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	<p>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.</p> <ul style="list-style-type: none"> – 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. 	<p>Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).</p> <ul style="list-style-type: none"> • The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. • The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the owner does not accept the descendant’s recommendations, the owner or the descendent may request mediation by the NAHC.

Geology and Soils

<p>Soil erosion, loss of topsoil, unstable geologic unit or soil, expansive soils</p>	<p>PMM-GEO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geology and soils, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City which would address the potential for soil erosion impacts.</p> <p>The Project would comply with LAMC Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit potential impacts associated with erosion to permitted levels.</p>
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	<p>identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems.</p> <p>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.</p> <p>c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.</p> <p>d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned</p>	<p>Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City’s Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</p>

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	wells are identified within construction areas to ensure the stability of nearby soils.	
Paleontological resources	<p>PMM GEO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>The Project site has been previously graded and is not known to contain any unique paleontological resource or site or unique geologic feature. However, excavation of 6 subterranean levels is proposed as part of the Site 2 Development will involve excavation and grading that could result in impacts to any subsurface paleontological resources that may be present on the site.</p> <p>The Project would be required to comply with existing regulations, as identified in Section 5.0 in the summary of <i>Regulatory Compliance Measures</i>, related to the inadvertent discovery of unknown paleontological resources, should they be encountered during ground disturbing activities. Specifically, the project would comply with:</p> <p>RCM GEO-2: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.</p>

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	<p>units with paleontological potential are present at the surface.</p> <p>c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.</p> <p>d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:</p> <ol style="list-style-type: none"> 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 	

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	<p>encountered during such activities, consistent with the specified or comparable protocols.</p> <p>4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas.</p> <p>e) Avoid routes and project designs that would permanently alter unique geological features.</p> <p>f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</p> <p>g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.</p> <p>h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.</p>	

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Greenhouse Gas Emissions		
	<p>PMM GHG-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: <ul style="list-style-type: none"> i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. 	<p>This mitigation measure is not incorporated because the Project’s generation of GHG emissions would not have a significant impact on the environment as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs.</p> <p>Moreover, pursuant to California PRC Section 21159.28(a), a Sustainable Communities Environmental Assessment prepared for a residential or mixed use development that is consistent with the RTP/SCS, such as the Proposed Project, need not analyze or discuss project-specific or cumulative greenhouse gas emission impacts from mobile source emissions generated by cars and light duty trucks.</p> <p>Further, the Proposed Project would comply with applicable regulations that will have the same or similar intent as PMM-GHG-1, including, but not limited to, Title 24 2019, which required measures to increase energy efficiency; Section 4.408.1 of Title 24 Part 11, California Green Building Standards Code (CALGreen), which requires recycling of 65% of construction and demolition waste; AB 939, which requires diversion of at least 50 percent of solid waste to landfills; the 2019 L.A. Green Building Code, which among other things requires fixtures to reduce potable water consumption and therefore wastewater generation within the development by at least 20 percent (codified in LAMC Section 99.04.303); City Ordinance No. 186,485, which requires electric vehicle ready and electric vehicle charging infrastructure for new multi-family dwellings constructed on a building site (codified in LAMC Section 99.04.106.4.2); and Section 110.10(b) of the California Energy Code (Part 6 of Title 24) that requires 15 percent of the roof area to be solar ready.</p>

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	<ul style="list-style-type: none"> x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. 	
	<ul style="list-style-type: none"> 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 <i>State CEQA Guidelines</i>. 	
	<ul style="list-style-type: none"> c) Include off-site measures to mitigate a project's emissions. 	
	<ul style="list-style-type: none"> d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> 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; 	

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	<ul style="list-style-type: none"> 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. 	
	<p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> 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; 	

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	<ul style="list-style-type: none"> ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply through: <ul style="list-style-type: none"> i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking. xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; 	
	f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;	
	g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and	
	h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: <ul style="list-style-type: none"> i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; 	

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	<ul style="list-style-type: none"> 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. 	
	<ul style="list-style-type: none"> 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; 	
	<ul style="list-style-type: none"> j) Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> 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 	

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	<ul style="list-style-type: none"> v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, 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: <ul style="list-style-type: none"> i. Staggered starting times ii. Flexible schedules iii. Compressed work weeks n) Implement commute trip reduction marketing, such as: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. Explicitly charging for parking for its employees; 	

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	<ul style="list-style-type: none"> 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. 	

Hazards and Hazardous Materials

<p>Routine transport use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school.</p>	<p>PMM HAZ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the Project’s use of hazardous materials would not have a substantial adverse effect on the environment as 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 developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. In addition, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers’ instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations. Therefore, significant impacts would not occur, and no mitigation beyond compliance with regulatory requirements is applicable.</p> <p>Project construction would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials can include paints, adhesives, surface coatings, cleaning agents, fuels, and oils. All such materials would be transported, used, and disposed of in conformance with all applicable regulatory requirements, thereby eliminating the risk of</p>
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c)	<p>Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:</p> <ul style="list-style-type: none"> – The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. – The location of such hazardous materials. – An emergency response plan including employee training information. – A plan that describes the way these materials are handled, transported and disposed. 	<p>potentially significant hazards. In addition, Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other urban residential development, and may include cleaning solvents, paints, and pesticides for landscaping. These potentially hazardous materials would be in and stored in accordance with regulatory requirements and manufacturers' instructions.</p> <p>Furthermore, the Project would adhere to regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances.</p>
d)	<p>Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</p>	
e)	<p>Avoid overtopping construction equipment fuel gas tanks.</p>	
f)	<p>Properly contain and remove grease and oils during routine maintenance of construction equipment.</p>	
g)	<p>Properly dispose of discarded containers of fuels and other chemicals.</p>	

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	<ul style="list-style-type: none"> 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. 	

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Accidental release of hazardous materials	<p>PMM HAZ-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following:</p> <ul style="list-style-type: none"> 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 	<p>This mitigation measure is not incorporated because the Project’s use of hazardous materials would not have a substantial adverse effect on the environment as 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 developments and would include vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. In addition, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers’ instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations. Therefore, significant impacts would not occur, and no mitigation beyond compliance with regulatory requirements is applicable.</p> <p>Project construction would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials can include paints, adhesives, surface coatings, cleaning agents, fuels, and oils. All such materials would be transported, used, and disposed of in conformance with all applicable regulatory requirements, thereby eliminating the risk of potentially significant hazards. In addition, Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other urban residential development, and may include cleaning solvents, paints, and pesticides for landscaping. These potentially hazardous materials would be in and stored in accordance with regulatory requirements and manufacturers’ instructions.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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	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.	Furthermore, the Project would adhere to regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances.
Release of hazardous materials near schools	<p>PMM HAZ-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials. 	This mitigation measure is not incorporated because the Project is not located within one-quarter mile of a school.
Hazardous materials sites, Government Code section 65962.5.	<p>PMM HAZ-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>Consistent with PMM HAZ-4, Phase I and Phase II Environmental Site Assessments (ESAs) were prepared for the Project site (see Appendix F). Based on the historical uses of the Project Site the potential to encounter soil contamination and subsurface structures during construction was identified and Soil Mitigation Plans (SMPs) were prepared to address the different conditions identified on Site 2 and Site 3.</p> <p>Implementation of these SMPs as required by Mitigation Measure HAZ-1 during construction will mitigate potential impacts to less than significant. Implementation of this project mitigation measure will be comparable and equally effective, and, for this reason,</p>

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

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	<p>f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.</p> <p>g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</p> <p>h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p> <p>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</p>	

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	<p>disposal, in accordance with applicable local, state and federal laws and policies.</p> <p>j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.</p> <p>k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.</p> <p>l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.</p> <p>m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business</p>	

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	<p>and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <p>n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law.</p> <p>o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration’s (Cal OSHA’s) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified 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.</p>	

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Emergency evacuation response plans	<p>PMM HAZ-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the City determined, based on the analysis of this topic in Section 6.0 of this SCEA that the Project would not result in a potentially significant impact related to any emergency response or emergency evacuation plans.</p>

Hydrology and Water Quality

<p>Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other</p>	<p>PMM HYD-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. 	<p>The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City.</p> <p>The Project would be subject to the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City’s discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil</p>
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**4.0 Incorporation of Mitigation Measures, Performance Standards,
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degrading water quality.	<ul style="list-style-type: none"> 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 	<p>erosion and sedimentation from entering the storm drains during the construction period.</p> <p>Consistent with the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 183,833) adopted to meet the requirements of the Municipal Separate Storm Sewer (MS4) Permit approved by the Los Angeles Regional Water Quality Control Board, the Project would be required to adhere to City discharge requirements and implement Best Management Practices (BMPs) to reduce stormwater pollution during demolition, grading, and construction activities. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City’s Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.</p> <p>To address potential impacts to water quality after the Project is built, the Project would be required to comply with the City’s LID Ordinance (Ordinance No. 181,899). The LID Ordinance applies to all development and redevelopment in the City that requires or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the runoff volume produced by the 85th percentile storm event in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	rights-of-way, not just later during the facilities design and construction phase.	and discharge requirements or otherwise substantially degrade water quality.
	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.	

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
<p>Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.</p>	<p>PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> a) Avoid designs that require continual dewatering when feasible. <p>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.</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the Project site is located in an urban setting and is developed as impervious surface parking. The Project would not require continual dewatering. During operation, the Project would be required to comply with the City’s LID Ordinance and would not obstruct existing flood flows.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Structures within 100-year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	<p>PMM HYD-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a.) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.</p>	This mitigation measure is not incorporated because there are no waterbodies within or near the Project Site, flooding is not expected to occur on- or off-site. The Project Site is not within a 100-year or 500-year flood hazard area according to Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Map.

Land Use and Planning

Physically divide a community.	<p>PMM LU-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Facilitate good design for land use projects that build upon and improve existing circulation patterns.</p> <p>b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by:</p>	This mitigation measure is not incorporated because the Project does not contain features or new infrastructure that would cause a permanent disruption in the physical arrangement of the established community. The Project would include pedestrian improvements, both along the existing street right-of-way and through the site between Olive Street and the South Park Commons, which would help connect the community in a manner that is consistent with this measure.
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**4.0 Incorporation of Mitigation Measures, Performance Standards,
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	<ul style="list-style-type: none"> – 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). <p>c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to:</p> <ul style="list-style-type: none"> – 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. 	
<p>Land use plans, policies, and regulations.</p>	<p>PMM LU-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that conflict with an adopted policy or regulation, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering</p>	<p>This mitigation measure is not incorporated because, as set forth in this document, the Project is consistent with the general use designation, density, building intensity, and applicable policies of SCAG’s <i>Connect SoCal: 2020–2045 RTP/SCS</i> as well as the RTP/SCS’s goals and policies. Accordingly, the Project does not conflict with the <i>Connect SoCal: 2020–2045 RTP/SCS</i>.</p> <p>In addition, the Project is consistent with applicable policies in the City’s <i>General Plan</i>, including Framework Element Objective 3.13 regarding the development of multi-family residential developments along corridors that are well-served by transit.</p>

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	<p>benefits of the project warrant an amendment to the general plan or land use regulation.</p>	<p>The Project Site is also subject to the Central City Community Plan, and the Project is consistent with its land use designation of Regional Center Commercial as well as the existing zoning designation zoned C2-4D-O allowing for residential uses.</p> <p>Moreover, as a multi-family residential transit-oriented project the Project is consistent with the Community Plan’s goals and objectives regarding the provision of encouraging alternative modes of transportation.</p> <p>As such, the Project would be consistent with applicable regional and local land use plans, policies, and regulations and this mitigation measure is not applicable.</p>

Mineral Resources

<p>Loss of availability of a known mineral resource.</p>	<p>PMM MIN-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>This mitigation measure is not incorporated because the Project site is not a source of mineral resources that are of value to the region. The Project is not located within a designated MRZ-2 Area, but it is located in both an Oil Drilling District and a State-designated oil field as it is within the boundaries of the LA Downtown Oil Field. However, the site is not used for oil extraction and the Project would not preclude the extraction from the LA Downtown Oil Field from other sites. As such, this mitigation measure is not applicable to the Project.</p>
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	<p>been identified in county and city general plans, or other comparable measures such as:</p> <ol style="list-style-type: none"> 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 MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources. 	
Noise		
<p>Expose people to noise in excess of local standards. Excessive groundborne vibration or</p>	<p>PMM NOISE-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that expose people to excessive noise levels, as applicable and feasible. Such measures may</p>	<p>This mitigation measure is not incorporated because comparable mitigation is identified that will be applied to the Project. The Initial Study portion of this SCEA concluded that noise during construction has the potential to impact noise sensitive uses in the vicinity of the Project Site. Comparable mitigation measures have been identified requiring construction management techniques that would reduce noise to a less than</p>

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<p>noise levels. Substantial permanent increase in noise level. Substantial temporary increase in noise levels.</p>	<p>include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 	<p>significant level. The mitigation measure included in the Initial Study is consistent with PMM Noise-1. As such, the Project would substantially conform with this mitigation measure.</p> <p>Project-related operational noise sources such as air conditioning units, other electrical equipment and parking structure vehicle movements would be required to comply with the City of Los Angeles' Building Code, Section 91.1207.14.2, which requires the Project to provide sufficient noise attenuation measures to achieve the 45 DBA CNEL interior noise level standard. Furthermore, the Project would be required to comply with LAMC Section 112.02's noise level standards, which restrict noise level increases from exceeding 5 DBA over the existing or presumed ambient noise level at an adjacent property line. In addition, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five dB.</p>

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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>ports on power equipment shall be muffled or shielded.</p> <p>h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 DBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 DBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.</p> <p>i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.</p> <p>j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</p> <p>k) Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.</p> <p>l) Projects that require pile driving or other construction noise above 90 DBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90</p>	

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	<p>DBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.</p> <p>m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;</p> <p>n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.</p> <p>o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.</p> <p>p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p> <p>q) Use of portable barriers in the vicinity of sensitive receptors during construction.</p> <p>r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets) and implement if such</p>	

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	<p>measures are feasible and would noticeably reduce noise impacts.</p> <p>s) Monitor the effectiveness of noise attenuation measures by taking noise measurements.</p> <p>t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.</p> <p>u) Construct sound reducing barriers between noise sources and noise-sensitive land uses.</p> <p>v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.</p> <p>w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.</p> <p>x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.</p> <p>y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.</p>	

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Expose people to excessive groundborne vibration or noise.	<p>PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to temporary construction noise, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the generation of groundborne vibration during construction of the Project would not have a substantial adverse effect on the environment. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required. Forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold of 0.12 peak particle velocity (ppv) as discussed in Section 4.0 of this SCEA.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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	<ul style="list-style-type: none"> e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors. 	

Population, Housing and Employment

<p>Displacement of housing requiring replacement housing elsewhere.</p>	<p>PMM-POP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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 of 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 	<p>This mitigation measure is not incorporated because there is no housing presently located on the Project Site. The Project would not result in displacement of any existing housing. Furthermore, the Project would develop new housing units on the Project Site.</p>
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**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>encouraged by the SCS (primarily TPAs, where applicable).</p> <p>e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.</p>	

Public Services

<p>Adverse effects associated with new or physically altered government facilities for fire protection, police protection, and emergency response.</p>	<p>PMM PSP-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of 	<p>This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in Section 6.0 of this SCEA, that the Project would not result in a potentially significant impact related to emergency response facilities.</p> <p>In addition, the Project would substantially conform with PMM PSP-1 through its required compliance with existing regulatory requirements. The LAFD considers fire protection services for a project adequate if the project is within the maximum response distance for the type of land use proposed. LAMC Section 57.507.3.3 states the maximum response distances for highly intensive industrial and commercial land uses is 1 mile for an engine company and 1.5 miles for a truck company, while the maximum response distances for high-density residential and commercial neighborhood land uses such as the Project are 1.5 miles for an engine company and 2 miles for a truck company. If these distances are exceeded, all new structures would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code (e.g., fire signaling systems, fire extinguishers, smoker removal systems). With such systems installed, fire protection would be considered adequate even if the Project is located beyond the maximum response distance.</p> <p>The proposed Project is located approximately 0.25 miles east of LAFD Station 10 (the first response station</p>
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**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	<i>Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure</i>	Applicability to Project
	<p>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.</p>	<p>for the Project), which is equipped with an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.</p> <p>The Project Site therefore meets the distance requirements of LAMC Section 57.507.3.3, even for the highly intensive land use category of industrial/commercial. However, a final determination regarding response distances would be made by the LAFD during the Project’s plan check process, and if LAFD determines the Project is outside of the maximum response distance for both an engine and a truck company, the Project would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the City of Los Angeles Fire Code, as set forth in the LAMC (e.g., fire signaling systems, fire extinguishers, smoker removal systems, etc.).</p> <p>The Project would also be required to demonstrate compliance with Fire Code requirements as part of LAFD’s hydrant and access plan check review as well as LAFD’s fire and life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118. In addition, the Applicant shall submit an emergency response plan to Los Angeles Fire Department prior to occupancy of the Project for review and approval. The emergency response plan would include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Furthermore, any required modifications shall be identified and implemented prior to occupancy of the Project.</p> <p>Compliance with all State and City regulatory requirements and guidelines that address fire flow, response distance, and emergency access will be equal to or more effective than PMM PSP-1.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
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Topic	<i>Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure</i>	Applicability to Project
		<p>The Project would substantially conform to this mitigation measure. The Project Site and the surrounding area are currently served by the Los Angeles Police Department (LAPD) Hollywood Station. The Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. In addition, the Project will generate revenues to the City’s General Fund (in the form of property taxes, sales tax 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, which includes security features, as well as the Project’s contribution to the General Fund, would help offset the Project related increase in demand for police services. As such, the Project would not cause significant impacts associated with new or physically altered police protection facilities. In addition, the Project incorporates measures that comply with the City’s public safety policies. These measures include implementation of on-site security features, coordination with the LAPD, and incorporation of crime prevention features such as fencing of construction sites:</p> <p>Provide temporary, 6-foot-high, commercial grade, chain-link construction fences to protect construction zones on the Project Site.</p> <p>Incorporate landscaping designs that will allow high visibility around the buildings and shall consult with the LAPD with respect to its landscaping plan.</p> <p>Provide security lighting around buildings and parking areas in order to improve security and shall consult with the LAPD as to its lighting plan.</p> <p>Provide the LAPD with the opportunity to review Project plans at the plan check stage of plan approval and shall incorporate any reasonable LAPD recommendations.</p>

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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
		<p>Provide the LAPD with a diagram of each portion of the Project Site, showing access routes and additional access information as requested by the LAPD, to facilitate police response.</p> <p>Compliance with all State and City regulatory requirements and guidelines that address police protection will be equal to or more effective than PMM PSP-1, and will thus, ensure conformance with the mitigation measure.</p>
<p>Adverse effects associated with new or physically altered government facilities for schools.</p>	<p>PMM PSS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</p>	<p>This mitigation measure is not incorporated because the Project would comply with existing regulatory requirements. Specifically, payment of required school fees to LAUSD is required by law and is considered full mitigation of all impacts to schools pursuant to SB 50 and California Government Code Section 65995. Therefore, pursuant to existing regulatory requirements the Project would be in substantial conformance with this mitigation measure.</p>
<p>Adverse effects associated with new or physically altered government facilities for libraries.</p>	<p>PMM PSL-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <p>a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.</p>	<p>This mitigation measure is not incorporated because the LAPL has no plans to construct any new libraries, so no impacts from construction would result from Project implementation. Therefore, this mitigation does not apply.</p>

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Parks and Recreation		
Increase use and physical deterioration of recreational facilities.	<p>PMM REC-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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 	<p>This mitigation measure is not incorporated because the Project would comply with existing regulatory requirements. Specifically, any potential adverse effects to City recreational facilities by Project residents would be minimized through compliance with LAMC Section 12.21 (G), pursuant to which the Project would include on-site open space, which would reduce demand placed on local parks and recreational facilities by Project residents. In addition, pursuant to LAMC Section 21.10.3, the Project will be required to make payment of any required dwelling unit construction tax to the City. The project would also pay the City-wide Park Fee.</p> <p>Therefore, pursuant to existing regulatory requirements, the Project would be consistent with this mitigation measure, would not require the addition of a new park or require the alteration or addition to an existing park or open space facility, and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
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v. Including trail systems and trail segments in General Plan recreation standards.

Transportation, Traffic, and Safety

<p>Conflict with measures of effectiveness for performance of the circulation system.</p>	<p>PMM-TRA-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • 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: <i>Integrating Demand Management into the Transportation Planning Process: A Desk Reference</i> (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region’s roadways: <ul style="list-style-type: none"> – 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; 	<p>This mitigation measure is not incorporated because the Project is well served by local and regional transit opportunities, is located within a Transit Priority Area (TPA). and provides for alternative modes of transportation including bicycling, and walking. Transit opportunities in the Project Site include various routes operated by Metro, including the Metro A Line (Blue) and Metro E Line (Expo), at Pico / Flower Station, located less than ½ mile from the Project Site.</p> <p>Furthermore, as demonstrated in the Transportation Assessment prepared for the Project by Gibson Transportation Consulting, Inc. (see Appendix J), the Project would not conflict with measures of effectiveness for the performance of the circulation system. The Project would provide adequate internal circulation to accommodate vehicular, pedestrian, and bicycle traffic without impeding through traffic movements on City streets. Specifically, the Project would not conflict with or be inconsistent with applicable City transportation plans or policies, would not result in any impacts pertaining to VMT, and would not result in any increased hazards due to a geometric design feature. In addition, the Project would not require temporary transit stop relocations and would not directly or indirectly result in a permanent removal or modification that would lead to the degradation of pedestrian or bicycle facilities. As such, this mitigation measure is not applicable.</p>
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	<ul style="list-style-type: none"> – 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. 	

<p>Inadequate emergency access. Impair or interfere with Emergency Response Plan or Evacuation Plan.</p>	<p>PMM TRA-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>This mitigation measure is not incorporated because the Project includes the preparation and implementation of a Construction Traffic Management Plan that includes comparable measures to avoid any effects on emergency response and evacuation plans. PDF TRANS-1 describes the requirements for this Construction Traffic Management Plan: PDF TRANS-1: A Construction Traffic Management Plan, including street closure information, a detour plan, haul routes,</p>
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Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>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:</p> <ul style="list-style-type: none"> – 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. 	<p>and a staging plan, will be prepared as part of the Project and submitted to the City for review and approval, prior to commencing construction. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions to be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the specific characteristics and timing of construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:</p> <ul style="list-style-type: none"> • 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 • Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Olive Street and 11th Street, to ensure traffic safety on public rights of way • Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men)

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	<ul style="list-style-type: none"> – 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. 	<ul style="list-style-type: none"> • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets • Potential sequencing of construction activity for Phase 1 and Phase 2 (Full Buildout) of the Project to reduce the amount of construction-related traffic on arterial streets • Containment of construction activity within the Project Site boundaries • Construction-related vehicles/equipment shall not park on surrounding public streets • Coordination with Metro to address any transit stop relocations • Coordination with LADOT Parking Meter Division to address loss of metered parking spaces • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate <p>Additionally, 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. Additionally, the LAFD would require the Project Applicant to prepare an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments.</p>

Tribal Cultural Resources

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Tribal cultural resources.	<p>PMM TCR-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>The Project is located within a highly developed urban area on a previously disturbed site and the potential for discovery of archaeological or tribal cultural resources is considered low. There are no known historic resources or archaeological resources, including tribal resources, on the Project Site that are listed or eligible for listing in the California Register of Historical Resources or the City of Los Angeles Historic-Cultural Monument List. The City is not aware of substantial evidence of any significant tribal cultural resources or other archeological resources on or adjacent to the Project Site that could be affected by the Project. As such, this mitigation measure does not apply.</p> <p>Furthermore, the project would be subject to the City’s standard condition of approval for the inadvertent discovery of cultural artifacts during excavation.</p>

Utilities and Service Systems

Landfill capacity, solid waste diversion.	<p>PMM USSW-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may</p>	<p>This mitigation measure is not incorporated because the Project would comply with existing regulations. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe</p>
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and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>include the following or other comparable measures identified by the Lead Agency:</p> <p>Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following:</p> <ul style="list-style-type: none"> 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 	<p>transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the CoIWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent CoIWMP 2018 Annual Report for Los Angeles County states that no solid waste disposal capacity shortfall is anticipated within the next 15 years (i.e., until 2033) under current conditions.</p> <p>The City's Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020.</p> <p>The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012. The City has also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA), which has the primary objective of achieving a zero-waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through these established City recycling programs and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects.</p> <p>In addition, in compliance with existing City standards and regulations, the Project would be required to</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required.</p> <p>h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target.</p> <p>i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.</p> <p>j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.</p> <p>k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.</p> <p>l) Integrate reuse and recycling into residential industrial, institutional and commercial projects.</p> <p>m) Provide education and publicity about reducing waste and available recycling services.</p> <p>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</p>	<p>recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. During construction, temporary waste separation bins would be provided onsite and would be disposed of properly as a part of the Project’s regular solid waste disposal program. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project’s waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving conformance with this mitigation measure.</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	and green waste recycling) and providing public education and publicity about recycling services.	
Require new or expanded entitlements for wastewater treatment.	<p>PMM-USWW-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • 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. 	<p>This mitigation measure is not incorporated because the Project would adhere to all applicable controls imposed via existing City and State regulations, including compliance with the LID Ordinance and SUSMP regulations. Runoff from the Project Site would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system. Therefore, through compliance with these existing regulatory requirements, the Project would not result in a significant increase in site runoff or significant changes in local drainage patterns, would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems, and would not require or result in construction of new storm water drainage facilities or expansion of existing facilities.</p>
Require new or expanded entitlements for water supply.	<p>PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p>	<p>This mitigation measure is not incorporated because the Project will comply with applicable existing water conservation regulations and the growth associated with the Project is consistent with current regional population projections.</p> <p>The projected population increase at the Project Site would be consistent with SCAG's population projections</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>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.</p> <p>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.</p> <p>c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</p> <p>d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater on site to tertiary standards and use it for non-potable uses on site.</p>	<p>for the City. Specifically, the addition of 3010 residents represents a 0.077 percent increase in resident population estimates for the City in 2016 (3010/3933800 total LA residents 2016 *100) and 0.063 percent of the estimated population in the City by 2045 (3010/4771300 project LA population 2045 *100). This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population.</p> <p>These 1,249 residential units would represent a 0.091 percent increase in the overall estimated housing units for the City in 2016 (1249/1367000 LA units 2016 *100) and 0.070 percent of the estimated housing units for the City by 2045 (1249/1793000 LA units 2045 *100). This increase would not be considered a substantial increase in housing for the area as the addition of 1,249 new multifamily residential units is within the anticipated housing increases based on SCAG projections for housing.</p> <p>Due to its consistency with these regional and local plans and policies, the Project would not induce significant growth or accelerate development in an undeveloped area that exceeds projected/planned levels. Moreover, the Los Angeles Department of Water and Power (LADWP) prepares an Urban Water Management Plan (UWMP) for City adoption every five years. The 2015 UWMP is based on SCAG population projections and determined that sufficient water supplies exist to serve the City through 2040. This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population.</p> <p>In addition, to ensure that water demand is reduced to the extent feasible, the Project would be required to comply with City Ordinance No. 170,978 (Landscape Ordinance), which imposes numerous water conservation measures in landscaping, installation, and</p>

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	<i>Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure</i>	Applicability to Project
		<p>maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p>In addition, the project would be consistent with the State Water Code (Section 10910-10915 and the California Green Building Code which addresses water supply within the City.</p> <p>Thus, it is reasonably anticipated that the Project would not create any water system capacity issues, and sufficient reliable water supplies would be available to meet Project demands. To further ensure consistency with State, regional, and local water conservation regulations as well as PMM USWS-1, the Project would meet the requirements of the Los Angeles Green Building Code and the requirements of Title 24 Building Energy Efficiency Standards and would adhere to the regulatory requirements of the City’s Landscape Ordinance.</p> <p>In addition, the Project would be required to comply with City Ordinance No. 170,978 (Landscape Ordinance). Water demand will be further reduced through incorporation of the following:</p> <ul style="list-style-type: none"> – Weather-based irrigation controller with rain shutoff. – Matched precipitation (flow) rates for sprinkler heads at turf areas. – Drip / microspray / subsurface irrigation where appropriate. – Minimum irrigation system distribution uniformity of 75 percent.

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
		<ul style="list-style-type: none"> – Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials. – Use of landscape contouring to minimize precipitation runoff. – A separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater. – The Project will be in substantial conformance with this mitigation measure.

Wildfire

Wildfire risk.	<p>PMM WF-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i>, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> 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. 	<p>This mitigation measure is not incorporated because the Project is not located within a designated Fire Buffer Zone or Mountain Fire District by the 1996 City General Plan’s Safety Element. The Project is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. Therefore, PMM WF-1 would not apply.</p>
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**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> – Ember-resistant vents – Fire-resistant roofs – Surrounding defensible space – Proper maintenance and upkeep of structures and surrounding area 	
Very High Hazard Severity Zones, SRAs.	PMM WF-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or	This mitigation measure is not incorporated because the Project is not located within a designated Fire Buffer Zone or Mountain Fire District by the 1996 City General Plan's Safety Element. The Project is not located in or near state responsibility areas or lands classified as

**4.0 Incorporation of Mitigation Measures, Performance Standards,
and Criteria from Prior Applicable EIRs**

Topic	Connect SoCal: 2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	<p>other comparable measures identified by the Lead Agency:</p> <p>a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to:</p> <ul style="list-style-type: none"> – 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. 	<p>very high fire hazard severity zones. Therefore, PMM WF-2 would not apply.</p>

Source: Southern California Association of Governments. *Connect SoCal: 2020–2045 SCAG/RTP SCS Final EIR*.

5.0 SCEA INITIAL STUDY CHECKLIST

Project Title:	DTLA South Park Properties Sites 2 and 3 Project
Environmental Case Number:	ENV-2018-2601-SCEA
Related Cases:	CPC-2018-2599-TDR-MCUP-ZV-DD-SPR; CPC-2018-2600-MCUP-ZV-TDR-DD-SPR
Project Location:	Site 2: 1105-1123 S. Olive Street, Los Angeles, CA 90015; Site 3: 1100-1130 S. Olive Street and 218-228 W. 11th Street, Los Angeles, CA 90015
Community Plan Area:	Central City
Council District:	14 – Kevin de León
Lead City Agency:	City of Los Angeles, Department of City Planning
Staff Contact Name / Address:	Sophia Kim 200 N. Spring Street, Room 621 Los Angeles CA 90012
Phone Number:	(213) 978-1208
Applicant Name / Address:	MACK REAL ESTATE GROUP 1150 S. Olive Street, Suite 2250 Los Angeles, CA 90015
Phone Number:	(213) 542-4317
General Plan Designation:	Regional Center Commercial
Zoning:	C2-4D-O

PROJECT DESCRIPTION: The proposed development consists of two separate mixed-use buildings on two project development sites separated by Olive Street in Downtown Los Angeles, known as DTLA South Park Properties Sites 2 and 3 Project (Project).

The proposed development at Site 2 includes the demolition of an existing surface parking lot; removal of one (1) existing non-protected street tree on Olive Street and two (2) non-protected street trees on 11th Street, and replacement with six (6) new street trees on Olive Street and two (2) new street trees on 11th Street; export of approximately 118,543 cubic yards of earth; and construction, use, and maintenance of a 51-story mixed-use building containing 536 dwelling units and 4,178 square feet of ground floor commercial space. The Site 2 Development would include a total floor area of 491,515 square feet with a floor area ratio (FAR) of 9.13:1 and a residential density of approximately 654 units per acre.

The proposed Site 3 Development includes the demolition of an existing surface parking lot; removal and replacement of five (5) existing non-protected street trees on Olive Street and three (3) existing non-protected street trees on 11th Street; replacement with six (6) new street trees on Olive Street and three (3) new street trees on 11th street; export of approximately 156,232 cubic yards of earth; and construction, use, and maintenance of a 60-story mixed-use building containing 713 dwelling units and 11,277 square feet of ground floor commercial space. The Site 3 Development would include a total floor area of 608,977 square feet with an FAR of 9:1 and a residential density of approximately 325 units per acre.

5.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

Determination (to be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.
- I find that the Project is a qualified “transit priority project” that satisfies the requirements of Section 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 potential significant effect on the environment, there will not be a significant effect in this case, because the Sustainable Communities Environment Assessment Initial Study identifies measures that either avoid or mitigate to a level of insignificance all potential significant or significant effects of the Project.

Signature

Date

5.2 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. “Negative Declaration: Less than Significant with Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
5. Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation 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 significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AESTHETICS				
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
AGRICULTURE AND FORESTRY RESOURCES				
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"/>

5.0 SCEA Initial Study Checklist

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY				
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"/>
BIOLOGICAL RESOURCES				
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
CULTURAL RESOURCES				
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ENERGY				
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"/>
GEOLOGY AND SOILS				
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GREENHOUSE GAS EMISSIONS				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
HAZARDS AND HAZARDOUS MATERIALS				
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"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 caused in whole or in part from the project's exacerbation of existing environmental conditions?	<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"/>
HYDROLOGY AND WATER QUALITY				
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"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input checked="" 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"/>
LAND USE AND PLANNING				
Would the project:				
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 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"/>
MINERAL RESOURCES				
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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
NOISE				
Would the project:				
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 checked="" type="checkbox"/>	<input 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"/>
POPULATION AND HOUSING				
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"/>
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:				
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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<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"/>
TRANSPORTATION				
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. Would the project 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"/>
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:				
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UTILITIES AND SERVICE SYSTEMS				
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 reasonable 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"/>
WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard 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"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife 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"/>
MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.3 SUMMARY OF PROJECT DESIGN FEATURES, MITIGATION MEASURES, AND REGULATORY COMPLIANCE MEASURES

The following summarizes the project design features (PDFs), mitigation measures (MMs) and specific regulatory compliance measures (RCMs), that have been identified for this Project that help reduce to a level of insignificance or avoid potentially significant or significant impacts on the environment.

AESTHETICS

Project Design Features

No Project Design Features are proposed for Aesthetics.

Mitigation Measures

No Mitigation Measures are proposed for Aesthetics.

Regulatory Compliance Measures

No regulatory compliance measures are identified.

AGRICULTURAL AND FOREST RESOURCES

Project Design Features

No Project Design Features are proposed for Agricultural and Forest Resources.

Mitigation Measures

No Mitigation Measures are proposed for Agricultural and Forest Resources.

Regulatory Compliance Measures

No regulatory compliance measures are identified.

AIR QUALITY

Project Design Features

No Project Design Features are proposed for Air Quality.

Mitigation Measures

No mitigation measures are required for Air Quality.

Regulatory Compliance Measures

RCM AQ 1. Consistent with SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation, the following measures shall be incorporated into Project plans and specifications:

- a) Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications.
- b) All diesel-powered off-road construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency (USEPA) Tier 4 or higher emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.
- c) All diesel-powered construction equipment shall use CARB Level 2 or higher diesel particulate filters.
- d) When possible, electricity shall be utilized from power supply sources rather than temporary gasoline or diesel power generators, as feasible.

RCM AQ 2: **Rule 402 (Nuisance).** This rule states 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 to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”

RCM AQ 3: **Rule 403 (Fugitive Dust).** This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. BACMs may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site-access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

RCM-AQ-4: **Rule 1113 (Architectural Coatings).** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Stationary emissions sources subject to these rules are regulated through SCAQMD's permitting process. Through this permitting process, SCAQMD

also monitors the amount of stationary emissions being generated and uses this information in developing AQMPs.

BIOLOGICAL RESOURCES

Project Design Features

No Project Design Features are proposed for Biological Resources.

Mitigation Measures

No mitigation measures are required for Biological Resources.

Regulatory Compliance Measures

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction

within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and federal laws pertaining to the protection of native birds. Such records shall be submitted and received into the case file for the associated discretionary action permitting the project.

CULTURAL RESOURCES

Project Design Features

No Project Design Features are proposed for Cultural Resources.

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:

- 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.
- 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.
- 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.

Regulatory Compliance Measures

RCM-CR-1. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendant may request mediation by the NAHC.

ENERGY

Project Design Features

- PDF-ENG-1:** Energy efficient lighting fixtures.
- PDF-ENG-2:** ENERGY Star rated appliances for residential dwelling units.
- PDF-ENG-3:** Low-flow water features.
- PDF-ENG-4:** Energy efficient mechanical heating and ventilation systems.

Mitigation Measures

No Mitigation Measures are proposed for Energy.

Regulatory Compliance Measures

No regulatory compliance measures are identified.

GEOLOGY AND SOILS

Project Design Features

No Project Design Features are proposed for Geology and Soils.

Mitigation Measures

- 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 CEQA lead 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.

Regulatory Compliance Measures

RCM GEO-1: As required by LAMC Section 91.7006, A final, design level, geotechnical, geologic, and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a California-registered geotechnical engineer and shall be submitted to the LADBS. The final geotechnical, geologic, and seismic hazard investigation report would specify exact design coefficients, as well as the type and sizing of structural building materials, site preparation requirements, and foundation design requirements; and demonstrate that construction procedures would meet the established performance standards. The site-specific geotechnical report shall be prepared to the written satisfaction of LADBS.

RCM GEO-2: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

GREENHOUSE GAS EMISSIONS

Project Design Features

No Project Design Features are proposed for Greenhouse Gas Emissions.

Mitigation Measures

No Mitigation Measures are required for Greenhouse Gas Emissions.

Regulatory Compliance Measures

No Regulatory Compliance Measures are identified for Greenhouse Gas Emissions.

HAZARDS AND HAZARDOUS MATERIALS

Project Design Features

No Project Design Features are proposed for Hazards and Hazardous Materials.

Mitigation Measures

HAZ-MM-1: The Soil Mitigation Plans for Site 2 dated November 2022, and for Site 3, dated September 2022, shall be implemented during construction.

Regulatory Compliance Measures

RCM-HAZ-1. The project shall provide a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

HYDROLOGY AND WATER QUALITY

Project Design Features

No Project Design Features are proposed for Hydrology and Water Quality.

Mitigation Measures

No mitigation measures are required for Hydrology and Water Quality.

Regulatory Compliance Measures

No Regulatory Compliance Measures are identified for Hydrology and Water Quality.

LAND USE AND PLANNING

Project Design Features

No Project Design Features are proposed for Land Use.

Mitigation Measures

No mitigation measures are required for Land Use.

Regulatory Compliance Measures

No regulatory compliance measures are identified.

MINERAL RESOURCESProject Design Features

No Project Design Features are proposed for Mineral Resources.

Mitigation Measures

No mitigation measures are required for Mineral Resources.

Regulatory Compliance Measures

No regulatory compliance measures are identified.

NOISEProject Design Features

No Project Design Features are proposed for Noise.

Mitigation Measures**MM-NOISE-1: Construction Noise**

- The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment. The contractor(s) shall limit unnecessary idling of equipment on or near the site. The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable. The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. For example, absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.
- Install temporary noise barrier that can achieve approximately 1.5 dB of additional noise level reduction for each one (1) meter (3.3 feet) of barrier height.
- Limit the number of noise-generating heavy-duty construction equipment (e.g., dozers, rollers, tractors, etc.) within 50 feet of the nearest sensitive receptor to two (2) pieces operating simultaneously.
- Install temporary noise barriers during construction.
- Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance.
- Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps).

- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools.
- Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.

Regulatory Compliance Measures

No regulatory compliance measures are identified for Noise.

POPULATION AND HOUSING

Project Design Features

No Project Design Features are proposed for Population and Housing.

Mitigation Measures

No mitigation measures are required for Population and Housing.

Regulatory Compliance Measures

No regulatory compliance measures are identified for Population and Housing.

PUBLIC SERVICES

Project Design Features

No Project Design Features are proposed for Public Services.

Mitigation Measures

No mitigation measures are required for Public Services.

Regulatory Compliance Measures

No Regulatory Compliance Measures are identified for Public Services.

RECREATION

Project Design Features

No Project Design Features are proposed for Recreation.

Mitigation Measures

No mitigation measures are required for Recreation.

Regulatory Compliance Measures

No regulatory compliance measures have been identified for Recreation.

TRANSPORTATION

Project Design Features

PDF TRANS-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Management Plan would 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 shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction workers or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Olive Street and 11th Street, to ensure traffic safety on public rights of way.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for Phase 1 and Phase 2 (Full Buildout) of the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Construction-related vehicles/equipment shall not park on surrounding public streets.
- Coordination with Metro to address any transit stop relocations.
- Coordination with LADOT Parking Meter Division to address loss of metered parking spaces.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.

Mitigation Measures

No mitigation measures are required for Transportation.

Regulatory Compliance Measures

No regulatory compliance measures have been identified for Transportation.

TRIBAL CULTURAL RESOURCES

Project Design Features

No project design features are required for Tribal Cultural Resources.

Mitigation Measures

No mitigation measures are required for Tribal Cultural Resources.

Regulatory Compliance Measures

No regulatory compliance measures are identified for Tribal Cultural Resources.

UTILITIES AND SERVICE SYSTEMS

Project Design Features

No project design features are required for Utilities.

Mitigation Measures

No mitigation measures are required for Utilities.

Regulatory Compliance Measures

No regulatory compliance measures are identified for Utilities.

WILDFIRE

Project Design Features

No project design features are required for Wildfire.

Mitigation Measures

No mitigation measures are required for Wildfire.

Regulatory Compliance Measures

No specific regulatory compliance measures were identified for Wildfire.

MANDATORY FINDINGS OF SIGNIFICANCE

See above project design features, mitigation measures, and regulatory compliance measures.

6.0 SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist as adjusted for use as a Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code (PRC) Section 21155.2(b). This analysis assumes all applicable mitigation measures (MMs) from the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are incorporated. Where applicable, project specific project design features (PDFs), regulatory compliance measures (RCMs), and/or mitigation measures (MMs) have been identified (see also **Section 5.0: SCEA Initial Study Checklist**) that help reduce to a level of insignificance or avoid potentially significant or significant impacts on the environment.

I. AESTHETICS

<i>Except as provided in Public Resources Code Section 21099, would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Senate Bill (SB) 743 (Public Resources Code (PRC) §21099(d)) defined new guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 miles of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit

station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

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

As described in **Section 2.0: Project Description**, the Project consists of mixed-use residential developments located on sites that have been previously developed and are surrounded by other urban uses. As such, the Project meets the criteria of PRC Section 21099 for a mixed-use residential project on an infill site.

The Project Site is well served by public transit operated by the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT (Downtown Area Shuttle (DASH)) and, Commuter Express (CE) as well as other transit services including the Santa Monica Big Blue Bus, Foothill Transit, Orange County Transportation Authority (OCTA), Torrance Transit, Gardena Municipal Bus, Commerce Municipal Bus, and Montebello Transit.

The Project Site is located in a transit priority area, as defined in SB 375 and ZI No. 2452, meaning it is within a one-half-mile vicinity of a major transit stop. The definition of a “major transit stop” in PRC Section 21064.3 includes “An existing rail or bus rapid transit station” and “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.”

The closest major transit stop to the Project Site is the Metro Pico Station, approximately 0.25 miles west of the Project Site, located at 1250 S. Flower Street on the northeastern corner of W. Pico Boulevard and S. Flower Street. Service is provided to the Metro Pico Station by the Metro A Line 801 and Metro E Line 806. The Metro A Line provides service to major destinations such as Downtown Los Angeles, Florence, Watts, Compton, and Long Beach. The Metro E Line provides service to major destinations such as Downtown Los Angeles, Exposition Park, Jefferson Park, West Adams, Culver City, Century City, West Los Angeles, and Santa Monica.

Because the Project is a mixed-use residential project on an infill site within a TPA, aesthetic impacts, including but not limited to (1) adverse effects on scenic vistas, (2) damage to scenic

resources, (3) degradation of existing visual character, including shade and shadow impacts, and (4) light and/or glare, are not considered significant impacts on the environment pursuant to SB 743. Notwithstanding, the following discussion of aesthetic effects of the project is provided for informational purposes only.

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

Less than Significant Impact. The Project Site is located within the South Park district of the Central City Community Plan area in Downtown Los Angeles. The Project Site is not located within or along a designated scenic corridor or roadway. The existing level of development on the site and in the surrounding area limits views across and beyond the site from surrounding roadways. The Project would become part of the Downtown Los Angeles skyline. Its scale and style are compatible with the existing skyline. As such and given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRs

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained PMM AES-1 addressing impacts to scenic vistas applicable if the Lead Agency identified significant effects. As no significant effects on scenic vistas have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. The Project Site is not bordered by or within the viewshed of a designated scenic highway. No historic buildings, rock outcroppings, or unique geologic features exist on the Project Site. State and County designated scenic highways in Los Angeles County include the Angeles Crest Highway in the San Gabriel Mountains, and portions of Topanga Canyon Boulevard, Malibu Canyon Road and Mulholland Highway in the Santa Monica Mountains, each of which is located over 10 miles the Project Site.¹ Because the Project Site is not located near any scenic highways it would not result in any effect on scenic resources within

¹ Caltrans, California State Scenic Highway System Map, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed December 2021.

any designated scenic highway. In addition, because the Project is a mixed-use residential project on an infill site within a TPA, any impact would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains PMM AES-2 addressing substantial degradation to the visual character of an area applicable if the Lead Agency identified significant effects. As no significant effects on scenic resources within a state designated scenic highway have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- 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?***

Site 2 and Site 3 are addressed separately below because the buildings proposed on each site have different characteristics.

SITE 2

Less than Significant Impact. Site 2 is within an urbanized area and therefore, impacts would only be considered significant if the Project were to conflict with applicable zoning and other regulations governing scenic quality. The Project includes a request for approval of Transfer of Floor Area Rights (TFAR) to allow more floor area than would be permitted by current zoning for the site. There is no height limit that applies to the site. The proposed building on Site 2 would be 51 stories and approximately 603 feet in height. Within the Central City Community Plan Area are commercial retail, office, restaurant, parking, residential, and mixed-use land uses ranging in various heights, with low-, mid-, and high-rise buildings in close proximity to Site 2. There are more than a dozen buildings greater than 600 feet in height within Downtown Los Angeles. As such, the height of the proposed Project would be compatible with the existing and planned visual character of Downtown Los Angeles. With approval of the TFAR request, the Project would not conflict with applicable zoning regarding building size. Furthermore, landscaping, signage, lighting, and streetscape would all be designed according to the applicable sections of the zoning code. For these reasons, and because the Project is a mixed-use residential project on an infill site within a TPA, any impacts would be less than significant.

SITE 3

Less than Significant Impact. Site 3 is within an urbanized area and therefore, impacts would only be considered significant if the Project were to conflict with applicable zoning and other regulations governing scenic quality. The Project includes a request for approval of Transfer of Floor Area Rights (TFAR) to allow more floor area than would be permitted by current zoning of the site. There is no height limit that applies to the site. The proposed building on Site 3 would be 60 stories and approximately 698 feet in height. Within the Central City Community Plan Area are commercial retail, office, restaurant, parking, residential, and mixed-use land uses ranging in various heights, with low-, mid-, and high-rise buildings in close proximity to Site 3. There are more than a dozen buildings greater than 600 feet in height within Downtown Los Angeles. As such, the height of the proposed Project would be compatible with the existing and planned visual character of Downtown Los Angeles. With approval of the TFAR request, the Project would not conflict with applicable zoning regarding building size. Furthermore, landscaping, signage, lighting, and streetscape would all be designed according to the applicable sections of the zoning code.

For these reasons, and because the Project is a mixed-use residential project on an infill site within a TPA, any impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains PMM AES-2 addressing substantial degradation to the visual character of an area applicable if the Lead Agency identified significant effects. As no significant effects on public views have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact.

LIGHT

Night lighting for the Project would be provided to illuminate the building entrances and common open space areas, and largely to provide adequate night visibility for visitors and to provide a

measure of security. The Project would utilize outdoor lighting designed and installed to meet City Code requirements for shielding. In general, lighting would be typical of residential high-rise structures found in the surrounding area. As such and given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

GLARE

The Project Site is currently developed with surface parking lots with minimal lighting. Reflective surfaces in the Project vicinity include automobiles traveling and parked on streets and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The exterior lighting located on the façade of the buildings would be shielded for glare.

Reflective surfaces in the Project vicinity include automobiles traveling and parked on streets and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The exterior lighting located on the façade of the buildings would be shielded for glare. The Project Site's architectural materials would include the use of a glazing system, metal panel, louver, and masonry, materials and finishes typical of modern high-rise structures. As such, the inclusion of highly polished materials and highly reflective metal material and glass could potentially increase reflected light and create localized glare conditions. Additionally, headlights within the parking podium would be fully screened and would not be visible from the street level. However, given that the Project is a residential mixed-use development within a Transit Priority Area, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains PMM AES-3 addressing light and glare impacts applicable if the Lead Agency identified significant effects. As no significant light or glare effects have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant. The analysis of cumulative impacts is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects, as shown in **Table 2-3: Related Projects List**. Development of the Project Site in

conjunction with related projects would result in an incremental intensification of land uses in an urbanized area of the City. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Therefore, related projects in combination with existing buildings and the Project are located within an urban area planned for development and would not encroach upon public views through street corridors. Overall, cumulative aesthetics impacts would be less than significant.

In addition, Public Resources Code Section 21099 provides that the aesthetic impacts of a mixed-use project, such as the Project, upon an infill site within a transit priority area shall not be considered significant impacts on the environment. Therefore, cumulative aesthetic impacts would be less than significant.

For these reasons, and because the Project is a mixed-use residential project on an infill site within a TPA, any impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. The Project Site is located within a developed and heavily urbanized area of the City of Los Angeles and is currently being utilized with surface parking lots. No farmland or agricultural

activity exists on or near the Project Site. According to the California Department of Conservation “Los Angeles County Important Farmland 2016” map, Site 2 is designated as “urban and built-up land.”² No portion of the Project Site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains PMM AG-1 through PMM AG-5 applicable if the Lead Agency identified significant effects on farmland. As no significant effects on farmland have been identified, these mitigation measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the LAMC. The Project Site has a land use designation of Regional Center Commercial and is zoned C2-4D-O for commercial and multi-family uses. The Project Site is not zoned for agricultural production, and there is no farmland at the Site. In addition, no Williamson Act Contracts are in effect for the Project Site according to the most recent status report by the California Department of Conservation.³ As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure measures PMM AG-2 applicable if the Lead Agency identifies a potential for conflict with a Williamson Act contract As no significant effects have been identified, this mitigation

² California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2012, map published January 2015, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>, accessed December 2021.

³ California Department of Conservation, Division of Land Resource Protection, Reports and Statistics (2018-2019), https://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx, accessed December 2021.

measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site has a land use designation of Regional Center Commercial, is zoned C2-4D-O for commercial and multi-family uses and is not zoned as forest land or timberland, and there is no timberland production at the site. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM AG-1 through PMM AG-5 is applicable if the Lead Agency identified significant effects. As no significant effects related to the rezoning of forest land have been identified, these mitigation measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site is not designated or zoned for forest or timberland or used for foresting. Additionally, the Project Site is located in an urbanized area of the city and is not within any forestland area. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM AG-1 through AG-5 applicable if the Lead Agency identified significant effects on forest land. As no significant effects on forest land has been identified, these mitigation

measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. Neither the Project Site nor nearby properties are currently utilized for agricultural or forestry uses. The Project Site is not classified in any “Farmland” category designated by the State of California. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM AG-1 through PMM AG-5 is applicable if the Lead Agency identified significant effects forests or farmland. As no significant effects on forests or farmland vistas have been identified, these mitigation measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not applicable incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

No Impact. The Project in combination with the related projects indicated in **Table 2-3: Related Projects List** would not significantly impact any agricultural or forestry resources as no such land occurs in the vicinity of the Project Site or related projects due to the existing urban development. The Los Angeles County Important Farmland Map maintained by the California Division of Land Resource Protection indicates that the Project Site and surrounding area, and the related projects are not included in the Important Farmland category.⁴ The related projects near the Project Site is on existing developed parcels and are not zoned for agricultural use, would not result in the loss of forest land, nor are they within the Williamson Act contract designated land. Therefore, no cumulative impacts regarding agricultural and forestry resources would occur.

⁴ California Department of Conservation, Division of Land Resource Protection, California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed December 2021.

III. AIR QUALITY

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<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"/>

Impact Analysis

Introduction

Criteria Air Pollutants

The State is divided into air quality jurisdictions; each jurisdiction is governed by a regional air district that oversees policy implementation, permitting of air pollution emission sources, and enforcement of regulatory requirements. Six criteria air pollutants (CAPs) are monitored at the federal, State, and regional levels. These six CAPs—ozone, particulate matter PM₁₀ and PM_{2.5}, nitrogen dioxide, carbon monoxide, lead, and sulfur dioxide—were identified based on a consensus of decades of research that concluded inhalation of each of the chemicals results in adverse health effects in humans. The six pollutants are described below:

1. Ozone (O₃) is a gas formed when volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), both byproducts of internal combustion engine exhaust and other sources, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months, when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
2. VOCs are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Adverse effects on human health are not caused directly by VOCs, but rather by reactions of VOCs to form secondary air pollutants, including ozone. VOCs themselves are not criteria pollutants; however, they contribute to the formation of ozone and are regulated under State policies.

3. Respirable particulate matter (PM₁₀) consists of extremely small, suspended particles or droplets 10 micrometers (µm) or smaller in diameter. Some sources of PM₁₀, like pollen and windstorms, are naturally occurring. However, in populated areas, most PM₁₀ is caused by road dust, diesel soot, combustion products, the abrasion of tires and brakes, and construction activities.
4. PM_{2.5} refers to fine particulate matter that is 2.5 µm or smaller in size. Sources of PM_{2.5} include fuel combustion from automobiles, power plants, wood burning, industrial processes, and diesel-powered vehicles, such as buses and trucks. These fine particles are also formed in the atmosphere when gases, such as sulfur dioxide (SO₂), NO_x, and VOCs are transformed in the air by chemical reactions.
5. Carbon monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, and because motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (Basin), the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
6. Nitrogen dioxide (NO₂) is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). NO₂ is also a byproduct of fuel combustion. The principal form of NO₂ produced by combustion is NO, but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ referred to as NO_x. NO₂ acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NO_x is only potentially irritating. NO₂ absorbs blue light, the result of which is a brownish-red cast to the atmosphere and reduced visibility.
7. Lead (Pb) occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so most such combustion emissions are associated with off-road vehicles, such as race cars, which use leaded gasoline. Other sources of Pb include the manufacturing and recycling of batteries; sanding or removal of lead-based paint; ink; ceramics; ammunition; and secondary lead smelters.
8. SO₂ is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of the burning of high-sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄).

Federal

The USEPA sets national vehicle and stationary source emission standards; oversees approval of all SIPs; provides research and guidance for air pollution programs; and sets National Ambient Air Quality Standards (NAAQS). The NAAQS for the six CAPs are shown in **Table 6-1: Ambient Air Quality Standards and Attainment Status** and were identified from provisions of the 1970

Clean Air Act (CAA). The sections of the CAA that are most applicable to the Project include Title I: Nonattainment Provisions and Title II: Mobile Source Provisions.

**TABLE 6-1
AMBIENT AIR QUALITY STANDARDS AND ATTAINMENT STATUS**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Nonattainment	—	Nonattainment
	8-hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic mean	0.03 ppm (57 µg/m ³)	Attainment	0.053 ppm (100 µg/m ³)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 µg/m ³)		0.100 ppm (188 µg/m ³)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Unclassified/ Attainment
	1 hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)	
Sulfur Dioxide (SO ₂)	1 hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24 hours	0.04 ppm		—	
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	—	Nonattainment
	Rolling 3-month average	—		0.15 µg/m ³	
Respirable Particulate Matter (PM ₁₀)	24 hours	50 µg/m ³	Nonattainment	150 µg/m ³	Attainment
	Annual arithmetic mean	20 µg/m ³		—	
Fine Particulate Matter (PM _{2.5})	24 hours	—	Nonattainment	35 µg/m ³	Nonattainment
	Annual arithmetic mean	12 µg/m ³		12 µg/m ³	

Source: CARB website at: CARB, Area Designations Maps/State and National, <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed December 2021.

Note: ppm = parts per million; µg = micrometer; m³ = cubic meter; mg = milligram.

The CAA and the promulgated standards have evolved as a living document over time as research into the effects of air pollution has enhanced regulatory understanding of the associated issues. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. On the national level, the USEPA designates regions as achieving “attainment” or suffering from “nonattainment” of the NAAQS based on air quality monitoring data. Regions that

are designated as being in nonattainment are responsible for devising localized strategies for reducing emissions of CAPs and achieving regional attainment within a predetermined time frame set by the USEPA.

The NAAQS were further amended in July 1997 to include an 8-hour standard for ozone and to adopt a NAAQS for PM_{2.5}. The NAAQS were amended again in September 2006 to include an established methodology for calculating PM_{2.5}, as well as to revoke the annual PM₁₀ threshold. Additional revisions to the AAQS may be implemented in the future as the science of air quality progresses.

State

California Air Resources Board

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). The California Air Resources Board (CARB) became part of the California Environmental Protection Agency in 1991 and is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 6-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Local

South Coast Air Quality Management District

SCAQMD shares responsibility with CARB for ensuring that all State and federal AAQS are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast and Salton Sea Air Basins, all of Orange County, and the non-desert portions of

Los Angeles, Riverside, and San Bernardino Counties. It does not include the Antelope Valley or the non-desert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions, primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the air basins. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the air basins. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as being in nonattainment of the NAAQS or CAAQS. The term “nonattainment area” is used to refer to an air basin in which one or more AAQS are exceeded. SCAQMD also prepares the SIP for its jurisdiction and promulgates rules and regulations. The SIP includes strategies and tactics to be used to attain the federal ozone standards in the South Coast Air Basin. The SIP elements are taken from the most recent AQMP.

SCAQMD approved a Final 2016 AQMP on March 3, 2017.⁵ The 2016 AQMP includes transportation control measures developed by SCAG from its 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS, as well as the latest 24-hour and annual PM_{2.5} standards. It should be noted that on September 3, 2020, SCAG adopted the *Connect SoCal 2020–2045 RTP/SCS*,⁶ which includes a SCS that addresses regional development and growth forecasts.

SCAQMD is responsible for limiting the amount of emissions that can be generated throughout the air basins by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board that limit the emissions that can be generated by various uses/activities and identifying specific pollution-reduction measures that must be implemented in association with various uses and activities. These rules regulate not only the emissions of the federal and State criteria pollutants, but also toxic air contaminants (TACs) and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD. The Project would comply with these rules which have been defined for the purposes of this document as the following Regulatory Compliance Measures:

RCM AQ 1: Consistent with SCAQMD Rule 401 and CARB’s In-use Off-road Diesel-Fueled Fleets Regulation, the following measures shall be incorporated into Project plans and specifications:

⁵ South Coast Air Quality Management District (SCAQMD). *Final 2016 Air Quality Management Plan (2016)*. <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>. Accessed December 2021.

⁶ Southern California Association of Governments (SCAG). *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*. “Chapter 1.” <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>. Accessed December 2021.

- Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications.
- All diesel-powered off-road construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency (USEPA) Tier 4 or higher emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.
- All diesel-powered construction equipment shall use CARB Level 2 or higher diesel particulate filters.
- When possible, electricity shall be utilized from power supply sources rather than temporary gasoline or diesel power generators, as feasible.

RCM AQ 2: Rule 402 (Nuisance): This rule states 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 to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”

RCM AQ 3: Rule 403 (Fugitive Dust). This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. BACMs may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site-access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

RCM-AQ-4: Rule 1113 (Architectural Coatings). This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Stationary emissions sources subject to these rules are regulated through SCAQMD's permitting process. Through this permitting process, SCAQMD also monitors the amount of stationary emissions being generated and uses this information in developing AQMPs.

City of Los Angeles

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the

assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new related projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

AIR POLLUTION CLIMATOLOGY

The Project Site is located within the Los Angeles County non-desert portion of the Basin, which is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfall, light winds, and moderate humidity.

This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO₂ react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO₂ emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 PM) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO₂ concentrations are also generally higher during fall and winter days.

AIR MONITORING DATA

For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area.

The Project Site is within SRA 1, Central Los Angeles County.⁷ The nearest air monitoring station SCAQMD operates is located at 1630 North Main Street.⁸ This station monitors O₃, NO₂, PM₁₀ and PM_{2.5}. **Table 6-2: Air Quality Monitoring Summary** summarizes published monitoring data from 2018 through 2020, the most recent 3-year period available. The data show that during the past few years, the region has exceeded the O₃, PM₁₀ and PM_{2.5} standards.

**TABLE 6-2
AIR QUALITY MONITORING SUMMARY**

Air Pollutant	Average Time (Units)	2018	2019	2020
Ozone (O ₃)	State Max 1 hour (ppm)	0.098	0.093	0.185
	Days > CAAQS threshold (0.09 ppm)	2	0	14
	National Max 8 hour (ppm)	0.073	0.080	0.118
	Days > NAAQS threshold (0.075 ppm)	4	2	22
	State Max 8 hour (ppm)	0.074	0.080	0.118
	Days > CAAQS threshold (0.07 ppm)	4	2	22
Carbon monoxide (CO)		—	—	—
Nitrogen dioxide (NO ₂)	National Max 1 hour (ppm)	0.070	0.070	0.062
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.070	0.069	0.061
	Days > CAAQS threshold (0.18 ppm)	0	0	0
Respirable particulate matter (PM ₁₀)	National Max (µg/m ³)	68.2	62.4	83.7
	National Annual Average (µg/m ³)	30.2	23.0	33.1
	Days > NAAQS threshold (150 µg/m ³)	0	0	0
	State Max (µg/m ³)	81.2	93.9	185.2
	State Annual Average (µg/m ³)	34.0	—	33.9
	Days > CAAQS threshold (50 µg/m ³)	31	15	34
Fine particulate matter (PM _{2.5})	National Max (µg/m ³)	61.4	43.5	175.0
	National Annual Average (µg/m ³)	12.8	10.8	13.7
	Days > NAAQS threshold (35 µg/m ³)	6	1	12
	State Max (µg/m ³)	65.3	43.5	175.0
	State Annual Average (µg/m ³)	16.0	10.8	15.0

Source: CARB, iADAM: Air Quality Data Statistics.

Note: (—) = Data not available.

⁷ SCAQMD. "General Forecast Areas and Air Monitoring Areas." map, <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>, accessed December 2021.

⁸ SCAQMD, *Site Survey Report for Los Angeles (Central)–North Main Street, AQS ID 060371103*, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-monitoring-network-plan/aaqmpn-losangeles.pdf?sfvrsn=16>, accessed December 2021.

SENSITIVE RECEPTORS

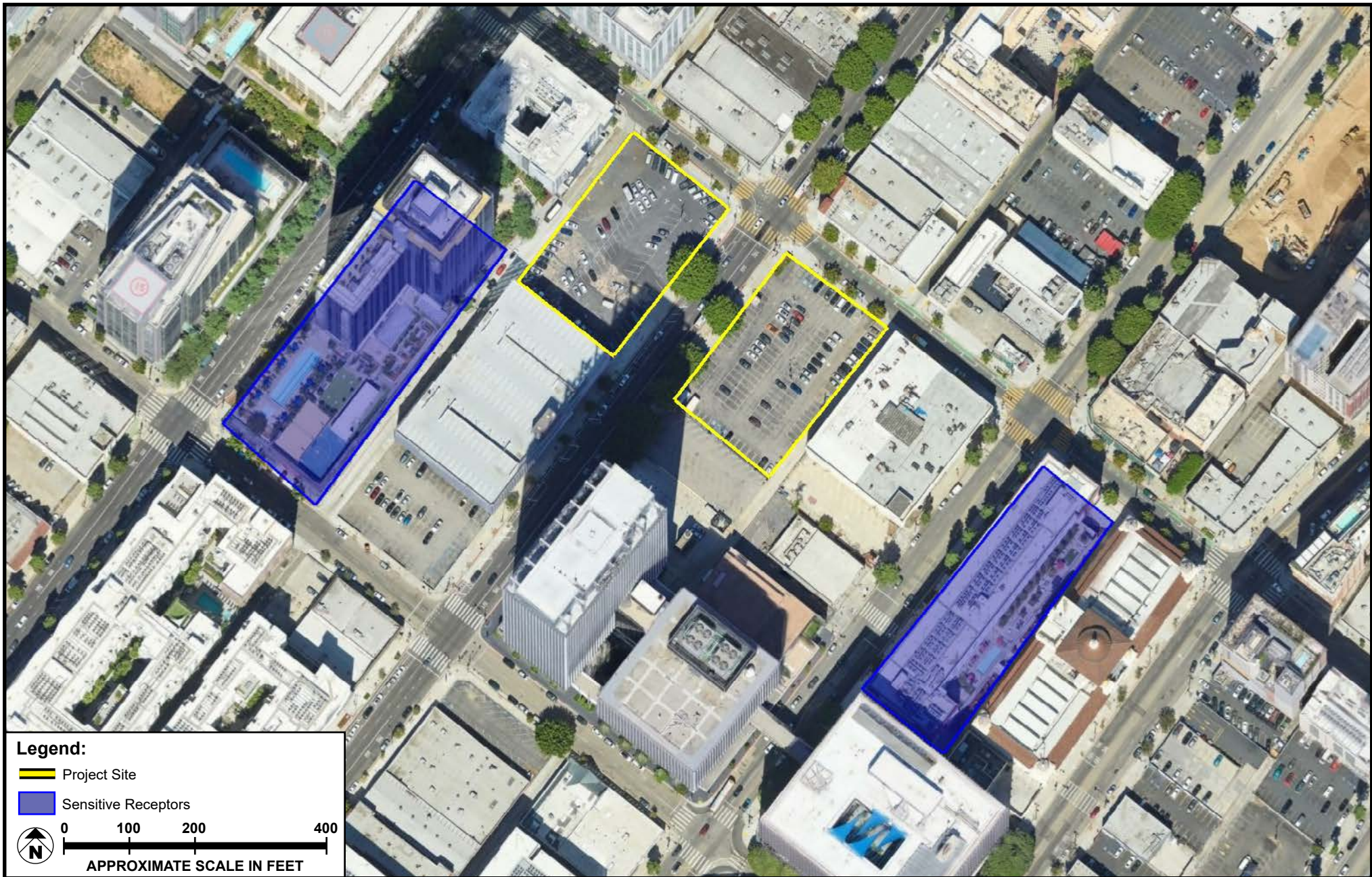
The SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Individuals who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. Some individuals are considered more sensitive to air pollutants than others because of preexisting health problems, proximity to the emission sources, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land uses are moderately sensitive to air pollution because the vigorous exercise associated with recreation facilities puts a high demand on respiratory system function. As seen in **Figure 6-1: Sensitive Receptors**, the nearest sensitive receptors to Site 2 include residential uses approximately 25 feet to the west across Margo Street at 1120 S. Grand Avenue, an apartment building. The nearest sensitive receptors to Site 3 include residential uses approximately 240 feet to the east at 1100 S. Hill Street, an apartment building.

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

CONSISTENCY WITH THE 2022 AQMP AND CONNECT SOCAL 2020-2045 RTP/SCS

Less than Significant Impact. The South Coast Air Quality Management District (SCAQMD) adopted an updated air quality management plan (AQMP) in December 2022.⁹ The Final 2022 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments; accommodate growth; reduce pollutants in the Basin; meet federal and State air quality standards; and minimize the fiscal impact of pollution control measures on the local economy. It builds on approaches in the previous AQMP to achieve attainment of the federal ozone air quality standard. These planning efforts have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

⁹ SCAQMD, *Final 2022 Air Quality Management Plan*, December 2022.



SOURCE: Google Earth - 2023

FIGURE 6-1



Sensitive Receptors

SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's *Connect SoCal 2020–2045 RTP/SCS* regarding population, housing, and growth trends. With regard to air quality planning, SCAG has prepared and adopted *Connect SoCal 2020–2045 RTP/SCS*,¹⁰ which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. Determining whether or not a project exceeds SCAG's growth forecasts involves the evaluation of the following: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. As discussed in *Subsection XI. Land Use and Planning*, the Project would conform to objectives outlined in the City of Los Angeles General Plan. Most notably, the Project would be well-served by mass transit, including multiple nearby bus lines provided by Metro and is located in both a TPA and HQT. The Project would include bicycle parking facilities adjacent to the entrance on Margo Street. The Project would create a pedestrian-friendly environment by providing a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons and a pedestrian plaza space at the corner of the 11th Street and Olive Street frontages adjacent to the Project's commercial uses. The Project would provide Metro mass transit riders access to the existing Metro light-rail station, extensive bus network that services the Site, and the proposed Los Angeles Streetcar, planned to service 11th Street in South Park. In addition to these mass transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities.

The *Connect SoCal 2020–2045 RTP/SCS* provides socioeconomic forecast projections of regional population growth. These growth forecasts are based on local plans and policies applicable to the specific area. As discussed in *Subsection XIV: Population and Housing*, construction of 536 units on the Site 2 Development, and 713 units on the Site 3 Development would result in an increase of approximately 3,398 residents in the City. According to growth estimates from SCAG's *Connect SoCal 2020–2045 RTP/SCS*, the City had an estimated population of 3,933,800 people in 2016 and is projected to have a population of 4,771,300 in 2045.¹¹ The addition of approximately 3,398 people generated by the Project would be less than 1 percent of the SCAG's population growth forecasts for the City.

¹⁰ SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, "Chapter 1," <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, Accessed on July 10, 2020.

¹¹ SCAG, "Demographics and Growth Forecast" (adopted September 2020), https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, accessed December 2021.

Additionally, the Basin is currently designated as nonattainment at the federal level for ozone and PM_{2.5}; and at the State level for O₃, PM₁₀, and PM_{2.5}. SCAQMD developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin. As shown in **Table 6-5** and **Table 6-6**, temporary emissions associated with construction of the Project would not exceed SCAQMD thresholds for regional emissions. Moreover, concurrent construction and operation emissions would not exceed SCAQMD thresholds. Additionally, as discussed further in **Table 6-6**, long-term emissions associated with operation would not exceed SCAQMD’s emission thresholds. As such, the Project is consistent with the growth assumptions in the regional air plan and would not contribute to air quality violations in the Basin. Impacts would be less than significant.

CONSISTENCY WITH THE GENERAL PLAN AIR QUALITY ELEMENT

In addition to the AQMP, the Air Quality Element of the City’s General Plan identifies policies and strategies to advance the City’s clean air goals. As shown below in **Table 6-3**, the Project would be consistent with the applicable policies of the Air Quality Element.

**TABLE 6-3
PROJECT CONSISTENCY WITH CITY OF LOS ANGELES GENERAL PLAN AIR QUALITY ELEMENT**

Policies	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	Consistent: The Project would minimize particulate emissions during construction through best practices and compliance with SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent The Project would not include the development of any unpaved roads or parking lots. As such the Project would minimize particulate emissions associated with traffic on unpaved surfaces.
Policy 2.1.1 – 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.	Consistent Future residents and employers could implement these transportation demand management strategies that help reduce traffic congestion, VMT, and subsequently air pollution. The Project’s proximity to high-quality transit options, walkability to nearby amenities, and inclusion of bicycle parking would encourage the reduction of vehicle trips and VMT.
Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting), in both the public and private sectors, in order to reduce work trips.	Consistent Future residents and employers could implement telecommunications strategies that reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive	Consistent: The Project’s proximity to transit and other walkable amenities would help reduce use of single-

Policies	Project Consistency
strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	occupant vehicles.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent The Project’s proximity to transit and other walkable amenities would help reduce use of single-occupant vehicles.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable: The Project would not include any facilities for the types of special events considered by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	Not Applicable: Traffic management by the City is outside the scope of this Project.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Not Applicable: This policy refers to actions of the City, to coordinated with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies, which is not within the scope of this project.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	Consistent: The Project is under review by the City.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent: The Project is a mixed-use development that would be proximate to transit, provide bicycle and electric vehicle parking and walkable routes to nearby amenities.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent: The Project’s air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.	Consistent: The Project would construct housing and commercial uses near transit and other neighborhood amenities allowing Project residents to walk and use transit to reach work, shopping, and entertainment.
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent: The Project would include electric vehicle parking.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains air quality mitigation measure PMM AQ-1 that would apply if a Lead Agency identified that a project has the potential for

significant environmental effects. The Project will comply with all existing regulations and would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1. For these reasons, PMM AQ-1 is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Basin is currently in State nonattainment for O₃, PM₁₀, and PM_{2.5}. In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple related projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."¹² Therefore, if a project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

Construction

Construction activities would create emissions of dust, fumes, equipment exhaust, and other air contaminants. Construction activities during the demolition/grading/excavation/site preparation phases would primarily generate particle pollution. Particles less than 10 micrometers in diameter (PM₁₀) and particles less than 2.5 micrometers in diameter (PM_{2.5}) would be the primary sources of particle pollution. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the site) would primarily generate nitrogen oxide (NO_x) emissions. The application of architectural coatings, such as paint, during the building construction phase would primarily result in the release of volatile organic compound (VOC) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The analysis of daily construction emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod version 2022.1.1.20) recommended by the SCAQMD. The Project

¹² SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003)*, Appendix A.

lies within the jurisdiction of the SCAQMD, compliance with SCAQMD rules and guidelines is required. Among the applicable SCAQMD rules are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Rule 403 requires the use of stringent best available control measures to minimize PM₁₀ emissions during grading and construction activities. Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for flat coatings. Additionally, effective January 1, 2024, CARB will require large and medium off-road vehicle fleets to utilize Tier 3 engines or higher.¹³ SCAQMD staff also recommends that the Lead Agency require the use of Tier 4 construction equipment of 50 horsepower or greater during construction. As discussed above, the Project will comply with this recommendation as required by the USEPA. Alternative, applicable strategies include equipment outfitted with Best Available Control Technology (BACT) devices and CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions.¹⁴ Compliance with CARB requirements would further reduce emissions below the SCAQMD significance thresholds.

Table 6-4: Project Construction Schedule provides the dates and durations of each of the activities that would take place during construction of Sites 2 and 3, as well as a brief description of the scope of work. Future dates represent approximations based on the general Project timeline and are subject to change pending unpredictable circumstances that may arise. As shown, the Site 2 building construction phase would occur concurrently with the Site 3 demolition and grading phases. Moreover, the Site 2 paving phase would occur concurrently with the Site 3 grading and building construction phases. Finally, the Site 2 architectural coating phase would occur concurrently with the Site 3 building construction phase. It is important to note that Site 2 would be operational before completion of Site 3. Specifically, Site 2 would be operational during the Site 3 building construction, paving, and architectural coating phases. These overlaps are considered in the analysis below to determine worst-case daily emissions.

**TABLE 6-4
PROJECT CONSTRUCTION SCHEDULE**

Construction Activity	Approximate Start Date	Approximate End Date	Duration (Days)	Description
Site 2				
Demolition	3/1/2026	4/4/2026	25	Removal of existing surface parking
Grading	4/5/2026	8/9/2026	90	Grading of site and export of 118,543 cubic yards of soil

¹³ California Air Resources Board (CARB), "Added Vehicle Restrictions and tier Phase-Out Requirements," <https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements>. Accessed November 2023.

¹⁴ CARB, "Verification Procedure: Stationary," <https://ww2.arb.ca.gov/our-work/programs/verification-procedure-warranty-and-use-compliance-requirements-use-strategies-4>, accessed December 2021.

Construction Activity	Approximate Start Date	Approximate End Date	Duration (Days)	Description
Site 2				
Building Construction	8/12/2026	5/15/2028	459	Construction of a new residential, retail, and restaurant uses
Paving	5/18/2028	7/16/2028	42	Paving of asphalt surfaces
Architectural Coating	7/17/2028	12/31/2028	120	Application of architectural coatings to building materials
Site 3				
Demolition	11/27/2027	12/31/2027	25	Removal of existing surface parking
Grading	1/1/2028	6/19/2028	121	Grading of site and export of 156,232 cubic yards of soil
Building Construction	6/22/2028	4/19/2030	477	Construction of a new residential, retail, and restaurant uses
Paving	4/20/2030	6/20/2030	44	Paving of asphalt surfaces
Architectural Coating	4/20/2030	12/29/2030	180	Application of architectural coatings to building materials

Note: Refer to Appendix A.1: Site 2 Air Quality and GHG Modeling Data and Appendix A.2: Site 3 Air Quality and GHG Modeling Data.

Table 6-5: Maximum Construction Emissions identifies daily emissions that are estimated to occur on peak construction days for both Sites 2 and 3 individually, and the maximum concurrent emissions from overlapping construction phases. Emissions presented in **Table 6-5** include regulatory compliance measures such as construction equipment controls (Tier 3 emissions standards with Level 3 DPF per CARB requirements)¹⁵ and control efficiency of PM₁₀ (dust control measures per SCAQMD Rule 403). As shown, construction-related daily emissions associated with both Sites 2 and 3, and concurrent construction would not exceed any regional SCAQMD significant threshold for criteria pollutants during the construction phases. Therefore, construction emissions would not contribute to a considerable increase in emissions of the pollutants for which the Basin is currently in nonattainment (O₃, PM₁₀, and PM_{2.5}). As such, construction impacts would be less than significant.

¹⁵ CARB, "Guide to Off-Road Vehicle & Equipment Regulations," website: https://ww3.arb.ca.gov/msprog/offroadzone/pdfs/offroad_booklet.pdf, accessed December 2021.

**TABLE 6-5
MAXIMUM CONSTRUCTION EMISSIONS**

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
Site 2						
2026	2	24	40	<1	7	3
2027	2	9	38	<1	7	2
2028	26	9	36	<1	7	2
Maximum Emissions	26	28	40	<1	7	3
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No
Site 3						
2027	1	13	15	<1	1	<1
2028	3	26	52	<1	10	3
2029	3	10	49	<1	10	2
2030	25	10	47	<1	10	2
Maximum Emissions	25	26	54	<1	10	3
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No
Concurrent Emissions						
Site 2 Building Construction / Site 3 Demolition	2	17	21	<1	1	1
Site 2 Building Construction / Site 3 Grading	2	16	21	<1	3	2
Site 2 Paving / Site 3 Grading	2	16	19	<1	3	2
Site 2 Paving / Site 3 Building Construction	1	12	15	<1	<1	<1
Site 2 Architectural Coating / Site 3 Building Construction	27	9	11	<1	<1	<1
Maximum Emissions	27	17	21	<1	3	2
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No

Note: Refer to Appendix A.1: Site 2 Air Quality and GHG Modeling Data and Appendix A.2: Site 3 Air Quality and GHG Modeling Data.

CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; VOC = volatile organic compound; SO_x = sulfur oxides.

As discussed previously, Site 2 would be operational prior to completion of Site 3. As such, operational emissions from Site 2 would be generated concurrently with the Site 3 building construction, paving, and architectural coating phases. **Table 6-6: Concurrent Construction /**

Operation Emissions identifies daily emissions that are estimated to occur during the overlapping operational and construction phases of Sites 2 and 3. Per SCAQMD guidance, this analysis utilizes the daily operational thresholds as they are more stringent than the daily construction thresholds. As shown in **Table 6-6** concurrent construction and operation emissions would be below SCAQMD’s operational thresholds. As such, impacts from concurrent construction and operation emissions would be less than significant.

**TABLE 6-6
CONCURRENT CONSTRUCTION / OPERATION EMISSIONS**

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
Site 2 Operation / Site 3 Building Construction	26	23	125	<1	17	5
Site 2 Operation / Site 3 Paving	26	20	121	<1	17	5
Site 2 Operation / Site 3 Architectural Coating	49	16	116	<1	17	5
Maximum Emissions	49	23	125	<1	17	5
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No

*Notes: Refer to Appendix A.1: Site 2 Air Quality and GHG Modeling Data, Appendix A.2: Site 3 Air Quality and GHG Modeling Data, Appendix A.3: Site 2 and Site 3 Air Quality and GHG Modeling Data.
CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; VOC = volatile organic compound; SO_x = sulfur oxides.*

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities after the Project is built and occupied. Area source emissions would be generated by the consumption of natural gas, landscape maintenance, and reapplication of architectural coatings. Mobile emissions would result from passenger vehicles traveling to and from the Project Site. More specifically, Site 2 would generate approximately 2,497 daily trips and Site 3 would generate approximately 3,440 daily trips.¹⁶ The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod as recommended by the SCAQMD with the inclusion of the project design features. The results of these calculations are presented in **Table 6-7: Maximum Operational Emissions**. As shown in **Table 6-7**, the emissions associated with the Project would not exceed the SCAQMD operational emission thresholds. As such, operational impacts would be less than significant.

¹⁶ See the *Transportation Assessment* contained in **Appendix J.1** of this SCEA.

**TABLE 6-7
MAXIMUM OPERATIONAL EMISSIONS**

Source	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	pounds/day					
Site 2 and Site 3						
Mobile	13	9	96	<1	24	6
Area	39	19	103	<1	2	1
Energy	<1	3	1	<1	<1	<1
Total	52	31	200	<1	26	7
<i>SCAQMD Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold exceeded?	No	No	No	No	No	No

Notes: Refer to Appendix A.3: Site 2 and Site 3 Air Quality and GHG Modeling Data.

CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns; VOC = volatile organic compound; SO_x = sulfur oxides.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains air quality mitigation measure PMM AQ-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not incorporated into the Project as no significant air quality effects have been identified. The Project will comply with all existing regulations and would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1.

Project-Specific Mitigation

No additional mitigation measures are necessary.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The SCAQMD devised the Localized Significance Threshold (LST) methodology¹⁷ to assess the potential air quality impacts that would result in the near vicinity of the Project.

¹⁷ SCAQMD, *Final Localized Threshold Methodology*, July 2008. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>

The LST methodology considers emissions generated from on-site sources and excludes emissions from off-site vehicular traffic. The SCAQMD provides mass rate lookup tables as a screening tool to determine the likelihood of localized impacts from Project construction and operation. As discussed previously, the nearest sensitive receptors to Site 2 include residential uses approximately 25 feet to the west across Margo Street. The nearest sensitive receptors to Site 3 include residential uses approximately 240 feet to the east along S. Hill Street. However, it should be noted that the residential uses associated with Site 2 would be operational prior to completion of Site 3. As such, residential uses would be located approximately 85 feet from Site 3 during construction. Ambient conditions for Central Los Angeles County, as recorded in SRA 1 by SCAQMD, were used in determining appropriate threshold levels. The LST mass rate look-up tables are applicable to NO_x, CO, PM_{2.5} and PM₁₀.

Construction

The results of the construction LST analysis are provided in **Table 6-8: Localized Construction Emissions**. **Table 6-8** identifies daily localized emissions that are estimated to occur on peak construction days for both Sites 2 and 3. Emissions presented in **Table 6-8** include regulatory compliance measures such as construction equipment controls (Tier 3 emissions standards with Level 3 DPF per CARB requirements)¹⁸ and control efficiency of PM₁₀ (dust control measures per SCAQMD Rule 403). As shown, construction-related localized emissions associated with both Sites 2 and 3 would not exceed the applicable SCAQMD localized significance thresholds for construction, even if the construction of the Site 2 Development and the Site 3 Development were to take place concurrently. As emissions would be below SCAQMD localized thresholds, impacts to sensitive receptors from localized emissions during construction would be less than significant.

**TABLE 6-8
LOCALIZED CONSTRUCTION EMISSIONS**

Source	NO _x	CO	PM ₁₀	PM _{2.5}
	On-Site Emissions (pounds/day)			
Site 2				
Total maximum emissions	9	10	2	1
<i>LST Threshold^a</i>	74	680	5	3
Threshold Exceeded?	No	No	No	No
Site 3				
Total maximum emissions	12	14	3	2
<i>LST Threshold^b</i>	82	743	5	3
Threshold Exceeded?	No	No	No	No
Combined Emissions				
Total Emissions (Site 2 and Site 3)	21	24	5	3

¹⁸ CARB, "Guide to Off-Road Vehicle & Equipment Regulations."

Source	NO _x	CO	PM ₁₀	PM _{2.5}
	On-Site Emissions (pounds/day)			

Notes: Refer to Appendix A.1: Site 2 Air Quality Modeling Data and Appendix A.2: Site 3 Air Quality and Modeling Data. CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

^a LST's based on a 0.8-acre site with a distance to sensitive receptors of 25 meters (82 feet).

^b LST's based on a 1.1-acre site with a distance to sensitive receptors of 25 meters (82 feet).

Operation

Local emissions from Project operation would include area and energy sources. Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product (including paint) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the CEC’s California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. The results of the operational LST analysis are provided in **Table 6-9: Localized Operational Emissions**. As shown in **Table 6-9**, emissions would not exceed the localized significance thresholds for operation. Therefore, localized operational impacts to sensitive receptors located around Sites 2 and 3 would be less than significant.

**TABLE 6-9
LOCALIZED OPERATIONAL EMISSIONS**

Source	NO _x	CO	PM ₁₀	PM _{2.5}
	On-Site Emissions (pounds/day)			
Site 2 and Site 3				
Total maximum area and energy emissions	22	104	2	2
LST Threshold ^a	98	974	2	2
Threshold Exceeded?	No	No	No	No

Notes: Refer to Appendix A.3: Site 2 and Site 3 Air Quality and Modeling Data.

CO = carbon monoxide; NO_x = nitrogen oxide; PM₁₀ = particulate matter less than 10 microns; PM_{2.5} = particulate matter less than 2.5 microns.

^a LST's based on a 1.9-acre site with a distance to sensitive receptors of 25 meters (82 feet).

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains air quality mitigation measure PMM AQ-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not applicable to the Project as no significant air quality effects have been identified. The Project will comply with all existing regulations and

would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less Than Significant Impact. According to the SCAQMD, “while almost any source may emit objectionable odors, some land uses will be more likely to produce odors...because of their operation.”¹⁹ Land uses that are more likely to produce objectionable odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

Construction

During construction, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent residences, they are temporary and intermittent in nature. As construction-related emissions dissipate, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. As such, construction impacts would be less than significant.

Operation

The operation of the Project includes mixed-use residential developments and would not contain any active manufacturing activities. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. Therefore, operational impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains air quality mitigation measure PMM AQ-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not incorporated into the Project as no significant air quality effects have been identified. The Project will comply with all existing

¹⁹ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, May 2005, 2-2.

regulations and would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, the State of California, and the federal government, and would be equal to or more effective than PMM AQ-1.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. The discussion above for *Threshold b.* addresses the potential for cumulative impacts for criteria pollutants that are not in attainment with applicable federal or State standards. As discussed above, the SCAQMD suggests that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulative considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As shown in **Table 6-5** and **Table 6-6**, construction emissions associated with Sites 2 and 3 would not exceed SCAQMD thresholds. Moreover, concurrent construction and operation emissions would not exceed SCAQMD thresholds. As shown in **Table 6-7**, total operational emissions associated with Sites 2 and 3 would not exceed SCAQMD thresholds.

Additionally, as shown in **Tables 6-8** and **Table 6-9**, localized emissions from Project construction and operation would also not exceed SCAQMD thresholds. SCAQMD guidance states that "projects that do not exceed the project specific thresholds are generally not considered to be cumulatively significant."²⁰ As such, the Project would not have a considerable contribution to a cumulative impact and would be less than significant.

²⁰ SCAQMD, *Cumulative Impacts White Paper*, Appendix D. <http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-workinggroup/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4>.

IV. BIOLOGICAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

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?

Less than Significant Impact. A project could have a significant impact on biological resources if it would result in (a) the loss of individuals, or the reduction of existing habitat of a State- or federal-listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g.,

from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

No rare plant or animal species have been previously recorded as specifically existing on the Project Site, which is currently developed with surface parking lots. Based on the lack of habitat currently on the site, it is unlikely any special-status species listed by the California Department of Fish and Wildlife or by the U.S. Fish and Wildlife Service would be present on site.

The Project Site includes ten (10) existing non-protected street trees, including one (1) street tree on Olive Street and two (2) street trees on 11th Street adjacent to Site 2, and four (4) street trees on Olive Street and three (3) street trees on 11th Street adjacent to Site 3. Removal of these ten (10) street trees and replacement with seventeen (17) street trees is proposed.

Removal of five (5) existing Indian laurel fig (*Ficus microcarpa*) street trees along the Olive Street edge of the site and replacement with twelve (12) London plane trees (*Platanus acerifolia*) is proposed. In addition, removal of five (5) existing Chinese flame trees (*Koelreuteria bipinnata*) along the 11th Street edge of the site and replacement with five (5) new Chinese flame trees is proposed.

Removal of street trees is subject to a 2:1 replacement ratio to the satisfaction of the Board of Public Works. As described above, removal of ten (10) street trees and replacement with seventeen (17) new street trees is proposed. The number of replacement street trees is limited to seventeen (17) trees by the City's location and spacing requirements for street trees. As the 2:1 replacement ratio cannot be met, an in-lieu fee will be paid and used to plant street trees in other locations in City Council District 14.

The existing trees may provide temporary habitat for migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). Additionally, Sections 3503, 3503.5, and 3512 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). However, tree removal would be undertaken pursuant to applicable City permits and requirements and would be required to comply with existing federal and State laws (MBTA and California Fish and Game Code, respectively). The Project would comply with these rules, defined for the purposes of this document as the following Regulatory Compliance Measures:

RCM-BIO-1: Tree Removal (Public Right-of-Way). Removal of trees in the public right-of way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. Per Section 62.177 of the LAMC, the Applicant shall pay an in-lieu tree

replacement fee for any trees removed in the public right-of-way that cannot be replaced on site.

RCM-BIO-2: Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86). If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such records shall be submitted and received into the case file for the associated discretionary action permitting the project.

Therefore, the Project would not have a substantial adverse effect, either directly or through habitat modification, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM BIO-1, PMM BIO-2, PMM BIO-3 are applicable if the Lead Agency identified significant effects on any special status species. As no significant effects on any special status species have been identified, these mitigation measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site consists of paved parking lots surrounded by urban uses. No riparian or other sensitive natural community is located on or adjacent to the Project Site. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM BIO-2 applicable if the Lead Agency identified significant effects on any riparian habitat. As no significant effects on any riparian habitat have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is not near, nor does it contain wetland habitat or any kind of natural or altered drainage course. The Project Site is entirely developed and covered with impermeable surfaces. Implementation of the Project would not have a substantial adverse effect on federally

protected wetlands as defined by Section 404 of the Clean Water Act (CWA) through direct removal, filling, hydrological interruption, or other means. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM BIO-3 applicable if the Lead Agency identified significant effects on federally protected wetlands. As no significant effects on federally protected wetlands have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated to the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. Interfere substantially with the movement of any 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. A project could have a significant impact on biological resources if it would interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is located in an area that has been previously developed in a heavily urbanized area of the City of Los Angeles. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. The existing trees on the Project Site may provide temporary habitat for migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). Additionally, Sections 3503, 3503.5, and 3512 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). However, tree removal would be undertaken pursuant to applicable City permits and requirements and would be required to comply with existing federal and State laws (MBTA and California Fish and Game Code, respectively).

These trees could potentially provide nesting sites for migratory birds, and, for this reason, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code. Compliance with these regulations has been identified as regulatory compliance measures **RCM-BIO-1** and **RCM-BIO-2**, as defined previously. Compliance with these existing regulations would ensure impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM BIO-4 applicable if the Lead Agency identified significant effects on native resident or migratory wildlife. As no significant effects on native resident or migratory wildlife have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

Less than Significant Impact.

The Project Site includes ten (10) existing non-protected street trees, including one street tree along Olive Street and two street trees along 11th Streets adjacent to the Site 2 and five street trees along Olive Street and three street trees adjacent to the Site 3. Removal of five (5) existing Indian laurel fig (*Ficus microcarpa*) street trees along the Olive Street edge of the site and replacement with ten (10) London plane trees (*Platanus acerifolia*) is proposed. In addition, removal of five (5) existing Chinese flame trees (*Koelreuteria bipinnata*) along the 11th Street edge of the site and replacement with five (5) Chinese flame trees (*Koelreuteria bipinnata*) is proposed.

The street tree removal is subject to a 2:1 replacement ratio to the satisfaction of the Board of Public Works. The number of replacement street trees is limited to seventeen (17) trees by the City's location and spacing requirements for street trees. As the 2:1 replacement ratio cannot be met, an in-lieu fee will be paid and used to plant street trees in other locations in City Council District 14.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM BIO-5 applicable if the Lead Agency identified significant effects on policies or ordinances related to biological resources. As no significant effects on policies or

ordinances related to biological resources have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. A significant impact could occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impact would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure SMM BIO-6 applicable if the Lead Agency identified significant effects related to consistency with an applicable conservation plan. As no significant effects have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not applicable to the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. The Project would have a less than significant impact upon biological resources with compliance with applicable regulations. The Project in combination with the related projects indicated in **Table 2-3** would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. The related projects near the Project Site are on existing developed land with no valuable wildlife habitat, native or otherwise. However, development of any of the related projects would be subject to the City of Los Angeles Tree Preservation Ordinance. As mentioned previously, there are currently no habitat conservation plans or natural community conservation plans within the City. As such, no cumulative impacts regarding adopted habitat conservation plan would occur. For these reasons,

6.0 Sustainable Communities Environmental Analysis

cumulative impacts to biological resources would be less than significant during construction or operation.

V. CULTURAL RESOURCES

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

a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Less than Significant Impact with Mitigation. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register, which automatically includes all properties listed in the National Register of Historic Places and those formally determined to be eligible for listing in the National Register.

The Project Site is located within the City of Los Angeles, which has been subject to a citywide historic resources survey known as SurveyLA. SurveyLA, the Los Angeles Historic Resources Survey, is the City’s comprehensive program to identify and document potential historic resources throughout the City of Los Angeles. SurveyLA is intended to provide baseline information on historic resources to inform planning decisions and support City policy goals and processes. The Project Site was not noted to be eligible as a national, State, or local cultural historic monument or have historic significance in the survey.²¹

²¹ Architectural Resources Group, *SurveyLA, Los Angeles Historic Resources Survey, Historic Resources Survey Report, Central City Community Plan Area*, September 2016

A series of literature reviews and records searches were conducted on March 12, 2018, September 14th, 2022, and October 16th, 2023, at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. These record searches included the Project Site as well as a 0.25-mile (mi) radius. The records search also included a review of the Office of Historic Preservation Archaeological Determination of Eligibility and the Office of Historic Preservation Directory of Historic Properties Data File.

The Project Site consists of two surface parking lots not designated or eligible for listing on the National Register of Historic Places, California Register of Historic Places, or the Los Angeles Historic Cultural Monument.²² The records search identified 12 historic resources within a quarter mile, but none located on Site 2.²³ The record search indicated that the age of the Occidental Tower at 1150 South Olive Street qualifies it for consideration to be a historic resource. However, in 2010 the building was evaluated for listing on the National Register of Historic Places and not recommended as eligible. In addition, the City determined it was not an eligible local historic resource due to a lack of integrity. As such, the property is not treated as a historical resource under CEQA.²⁴ Construction and operation of the proposed buildings would not alter any of the physical characteristics of or materially impact any nearby historic resources. Additionally, construction and operation of the proposed buildings would not alter the historic context of these buildings. The proposed buildings would be compatible in mass, size, and scale with the development pattern of the surrounding portion of Downtown Los Angeles and would not adversely alter the design, character or feeling associated with these historic resources. Therefore, impacts would be less than significant.

The September 14th, 2022, records search was conducted to review all of the documents and resource records that are associated with the zanja system within Los Angeles County. The Zanja Madre (Mother Ditch) System, built in 1781, was the first water conveyance system constructed from the Los Angeles River westward to El Pueblo de la Reina de Los Angeles. It was initially constructed as an open, gravity-flow ditch approximately 3 feet (ft) wide and 1 ft deep. The first segment of the Zanja Madre ran from a point on the Los Angeles River north of the city, south near present-day Main Street, and terminating near the Plaza (present-day Union Station). Due to a series of floods in the 1870s, the ditch was enclosed, first in wooden flumes and then, in 1885, in brick conduit. By the late nineteenth century, there were a total of 19 zanja segments, most of which had been lined with concrete or cement piping. The zanja system largely faded into disuse by 1904 for the system's inefficiency. Eight previous studies which have been conducted

²² Architectural Resources Group, Inc. *SurveyLA Central City Community Plan Area, Pasadena, CA*. September 2016 https://planning.lacity.org/odocument/c118f301-cc39-4ede-af5a-3e5ec901e7be/SurveyLA_Master_Report.pdf, accessed December 2021.

²³ PaleoWest Archaeology. *Desktop Cultural Resource Review in Support of the 1100 and 1105 Olive Street Project in Los Angeles, Los Angeles County, California*. October 31, 2023. (See **Appendix C.**)

²⁴ Communication with Office of Historic Resources, Los Angeles Department of City Planning, June 8, 2021.

within 0.25 mi of the Project area studies were examined for any evidence or mention of the Zanjias or its tributary channels in the immediate vicinity of the Project area.

None of these studies encompassed the Project area, and no extant segments of the Zanjias or its tributary channels have been formally documented within the Project area. One previously reviewed study included a map of the zanja water conveyance system overlain on the Hollywood, California USGS 7.5' quadrangle that depicts a segment of the zanja system, identified as Zanja No. 8 on an 1880 map of the system, which follows the alignment of Olive Street from an area around Pershing Square to the southwest to 9th Street, at which point the zanja diverges into two segments. The eastern segment continues to follow Olive Street to Olympic Boulevard before continuing in a more southerly direction and terminating at 11th Street. The western segment continues southwest, paralleling the west side of Olive Street near the Project Site at 1105 Olive Street to 12th Street, before continuing in a more west-south westerly direction. This and other data on the zanja system reviewed is largely based on maps and records over 100 years old.

There is insufficient evidence to conclude precisely where Zanja No. 8 may be located in relation to the Project area. Nonetheless, based on a review of the outlined data, there appears to be a very low possibility of encountering Zanja No. 8 within the Project area on the east side of Olive Street (1100 Olive Street – Site 3) during Project construction. However, there does appear to be the potential for encountering portions of and/or artifacts or features associated with the zanja system on the west side of Olive Street (1105 Olive Street – Site 2) during construction.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM CULT-1 applicable if the Lead Agency identified significant effects on historical resources. PMM CULT-1 is incorporated into the Project to avoid potential impacts to any subsurface historic resources that may be encountered during construction of the Project.

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. A survey shall be conducted where the records indicate that no previous survey has been conducted, or if a 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.

Consistent with PMM CULT-1 (j) because the Project Site is developed and no natural ground surface is exposed, sensitivity for subsurface resources was assessed based on archaeological desktop assessment. This assessment included conducting archeological records and sacred lands file searches consistent with PMM CULT-1 (f) and (g).

The desktop assessment of the Project area determined there are no previously recorded resources documented within the Project area. As discussed previously, there is insufficient evidence to conclude precisely where Zanja No. 8 may be located in relation to the Project area. Nonetheless, based on a review of available data, there appears to be a very low possibility of encountering Zanja No. 8 within the Project area on the east side of Olive Street (1100 Olive Street – Site 3) during Project construction. However, there does appear to be the potential for encountering portions of and/or artifacts or features associated with the Zanja system on the west side of Olive Street (1105 Olive Street – Site 2) during construction.

Consistent with PMM CULT-1 (j) an archaeological monitor will be retained to observe all ground disturbing activities and if any cultural resources, including any indications of the Zanja Madre are encountered, construction activities and excavation in the area where cultural resources are found will be stopped until a qualified archaeologist can determine whether these resources are significant consistent with PMM CULT-1 (l) and appropriately addressed.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact with Mitigation. The Project Site is located within an urbanized area that has been subject to grading and development in the past. There are no known archaeological sites or archaeological survey areas on or adjacent to the site.²⁵ As discussed previously, the possibility of encountering portions of zanja system within the Project area on the east side of Olive Street (Site 3) is very low. There does appear to be the potential of encountering portions of and/or artifacts or features associated with the zanja system on the west side of Olive Street (Site 2) during construction. PMM CULT-1 (j), which is incorporated into the Project, requires an archaeological monitor to be retained to observe all ground-disturbing activities. If any cultural resources, including any indications of the Zanja Madre are encountered, construction activities and excavation in the area where cultural resources are found will be stopped until a qualified archaeologist can determine whether these resources are significant and appropriately addressed.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained a

²⁵ PaleoWest Archaeology. *Desktop Cultural Resource Review in Support of the 1100 and 1105 Olive Street Project in Los Angeles, Los Angeles County, California*. October 31, 2023. (See **Appendix C.**)

mitigation measure applicable if the Lead Agency identified significant effects on archaeological resources. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM CULT-1 applicable if the Lead Agency identified significant effects on historical resources. PMM CULT-1 is incorporated into the Project to avoid potential impacts to any subsurface historic resources that may be disturbed during construction of the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. The Project Site is located in an urbanized area and has been subject to grading and development in the past. No known burial sites are located on or adjacent to the site. While the Project Site has been previously disturbed for previous development, the grading needed to construct the Project could result in a significant adverse effect due to potential disturbance of human remains. However, no human remains are known to exist on the Project Site. The Project would comply with the State's Health and Safety Code Section 7050.5, defined for the purposes of this document as Regulatory Compliance Measure **RCM CR-1**:

RCM-CR-1: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033 (323) 343-0512 (8 a.m. to 5 p.m. Monday through Friday) or (323) 343-0714 (After Hours, Saturday, Sunday, and Holidays).
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

Through compliance with the regulatory standards described above, potential Project impacts to human remains would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure applicable if the Lead Agency identified significant effects on human remains, specifically PMM CULT-2 and PMM TCR-1. As no significant effects on human remains have been identified, and **RCM-CR-1** is comparable, these mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR are not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less than Significant Impact. The Proposed Project in combination with the related projects indicated in **Section 2.0: Project Description, Table 2-3** would not significantly impact any cultural resources, as no California Points of Historical Interest, California Historical Landmark, or CRHR listed or eligible properties are on or within the vicinity of Project (see **Appendix C**). The related projects near the Project Site are on existing developed sites and would be subject to the same regulatory measures applicable to discoveries of cultural and archeological resources and human remains. As such, no significant cumulative impacts to cultural resources would result from the Project and related projects.

VI. ENERGY

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

The following plans and policies address energy efficiency.

U.S. Clean Power Plan

On October 23, 2015, the EPA issued the Clean Power Plan under Section 111(d) of the Clean Air Act. The Clean Power Plan is also known as the Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units rule. The goal of the Clean Power Plan is to reduce carbon dioxide (CO₂) emissions from existing power plants 32 percent from 2005 levels by 2030, with incremental interim goals for the years 2022 through 2029. The Clean Power Plan set a CO₂ emission reduction target for each state and requires each state to develop a plan to achieve the target. At the same time EPA issued the Carbon Pollution Standards for New, Modified and Reconstructed Power Plants rule under Section 111(b) of the Clean Air Act, to limit CO₂ emissions from new, modified, or reconstructed electricity generating units by implementing Best System of Emissions Reduction (BSER) for each type of generating unit. California’s Proposed Compliance Plan for the Federal Clean Power Plan was adopted by CARB on July 27, 2017.

Assembly Bill 32

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

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans

that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA.

Senate Bill 1368

SB 1368, the California Greenhouse Gas Emissions Performance Standard Act, enacted in 2006, prohibits California utilities from entering into long-term financial commitments for base load generation, unless it complies with the GHG emissions performance standard. As this standard also applies to existing power plants for any long-term investments or contractual extensions, it affects Los Angeles Department of Water and Power (LADWP)'s coal-fired generation resources.

Senate Bill 2 (1X)

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

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

Senate Bill 350

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

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

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

Senate Bill 32

SB 32, signed in 2016, updated AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires the State board to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

CEQA Guidelines Appendix F & G

In accordance with Appendices F and G of the CEQA Guidelines, and in order to ensure that energy implications are considered in project decisions, projects are required to include a discussion of the potential significant energy impacts, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (PRC Section 21100(b)(3)). The 2020 update to Appendix G of the CEQA Guidelines now provides that if a project would result in potentially significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, then an EIR shall be prepared for the project that includes mitigation measures for that energy use. The project's analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project as further described below under Appendix F of the CEQA Guidelines.

Appendix F of the CEQA Guidelines provides a list of energy-related topics that may be discussed in an EIR, where topics are applicable or relevant to the project, including:

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

Responses to each topic are identified below.

Los Angeles Green Building Code

The City of Los Angeles L.A. Green Building Code (Ordinance No. 181,480), effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Compliance with these State and local codes and commitments to voluntary measures such as the commitment for the Project to meet energy efficiency standard comparable to LEED Silver, and measures identified in the approved Water Supply Assessment including the use of high efficiency toilets and showerheads, Energy Star washers, water-saving pool features, and drought tolerant landscaping would ensure the efficient use of energy resources during construction and operation of the Project.

City of Los Angeles Sustainable City pLAN/L.A.'s Green New Deal

The City of Los Angeles Sustainable City pLAN was released in April, 2015. The pLAN sets out a vision for cutting GHG emissions, reducing the impact of climate change and building support for national and global initiatives. In 2019 the City released L.A.'s Green New Deal as an update to the pLAN. Through the pLAN and Green New Deal, the City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

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

Less than Significant Impact. The following analysis includes an estimate of the electricity, natural gas, and transportation fuel usage associated with the Project and evaluates whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy. In accordance with Appendix F of the CEQA Guidelines, the analysis includes relevant information to address the energy implications of the Project.

LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 7,531 megawatts (MW).²⁶ In 2017, LADWP's power system experienced an instantaneous peak demand of 6,431 MW. Approximately 29 percent of LADWP's 2016 electricity purchases were from renewable sources, which is similar to the 25 percent Statewide percentage of electricity purchases from renewable resources.

²⁶ Los Angeles Department of Water and Power (LADWP), *2017 Power Strategic Long-Term Resource Plan*, December 2017.

According to the CEC, transportation accounts for nearly 40 percent of California's total energy consumption. In 2019, the most recent year of publicly available data, California consumed approximately 661,893,000 barrels (27,799,506,000 gallons, or 42 gallons per barrel) of petroleum for transportation.²⁷ Incentive programs, such as the CEC's Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the State to reduce its dependency on gasoline. Several regulations adopted by California to reduce GHG emissions, such as SB 375, have the added benefit of reducing the State's demand on petroleum-based fuels by requiring reductions in vehicle miles traveled (VMT) and by reducing the carbon intensity of transportation fuels. The CEC predicts that the demand for gasoline will continue to decline over the upcoming years, and there will be an increase in the use of alternative fuels.²⁸

The Project would comply with Title 24, Part 6 of the California Code of Regulations (CCR), also known as Building Energy Efficiency Standards, which regulates the design of building shells and building components. The Title 24 standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The CEC adopted the 2019 Building Energy Efficiency Standards (2019 Building Standards), effective January 1, 2020.²⁹

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CALGreen, establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CALGreen is periodically amended; the most recent 2019 standards became effective on January 1, 2020, and would apply to the Project. The Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory voluntary green building measures to conserve energy. Compliance with these State and local codes and measures identified in the approved Water Supply Assessment including the use of high efficiency toilets and showerheads, Energy Star washers, water-saving pool features, and drought tolerant landscaping would ensure the efficient use of energy resources during construction and operation of the Project.

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance,

²⁷ US Energy Information Administration, Independent Statistics & Analysis, "Table F16: Total Petroleum Consumption Estimates, 2019," https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US, accessed December 2021.

²⁸ California Energy Commission (CEC), *Final 2019 Integrated Energy Policy Report*, <https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report>, accessed December 2021.

²⁹ CEC, "2019 Building Energy Efficiency Standards," <https://www.energy.ca.gov/title24/2019standards/>, accessed December 2021.

and/or removal. If appropriate, the energy intensiveness of materials may be discussed;

Construction

During construction, energy would be directly consumed on a limited basis to power lights, and electronic equipment, and indirectly for the conveyance of water used for dust control during grading. As discussed below, construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment within the Project Site, construction worker travel, haul trips, and delivery trips.

As shown in **Table 6-10: Summary of Energy Use During Construction**, the Site 2 Development would consume approximately 23.5 kilowatt-hours (kWh) of electricity during construction and the Site 3 Development would consume approximately 32.3 kWh of electricity during construction, for a total of 55.8 kWh of electricity. Moreover, the Site 2 Development would consume approximately 286,182 gallons of diesel fuel, and 159,256 gallons of gasoline during construction, and the Site 3 Development would consume approximately 326,327 gallons of diesel fuel, and 256,723 gallons of gasoline during construction. As such, the Project would result in a total consumption of 612,509 gallons of diesel fuel, and 415,979 gallons of gasoline during construction.

**TABLE 6-10
SUMMARY OF ENERGY USE DURING CONSTRUCTION**

Fuel Type	Quantity
<i>Electricity</i>	
Site 2	23.5 kWh
Site 3	32.3 kWh
Total	55.8 kWh
<i>Diesel</i>	
Site 2	286,182 gallons
Site 3	326,327 gallons
Total	612,509 gallons
<i>Gasoline</i>	
Site 2	159,256 gallons
Site 3	256,723 gallons
Total	415,979 gallons

Source: Refer to **Appendix D** for detailed energy calculations.

Electricity

During construction, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP distribution infrastructure and would be obtained from existing substations and electrical lines in and around the Project Site.

As shown in **Table 6-10** above, a total of approximately 55.8 kWh of electricity is anticipated to be consumed during 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.

Due to the relatively short duration of the construction process, and the fact that the extent of electricity consumption is inherent to construction projects of this size and nature, electricity consumption impacts would not be considered excessive or substantial with respect to regional supplies. The energy demands during construction would be typical of construction projects of this size and construction of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity resources. Accordingly, impacts to electricity demand during construction would be less than significant.

Natural Gas

Construction activities do not typically involve the consumption of natural gas as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction. As a result, the Project would not result in inefficient, or unnecessary consumption of natural gas during construction. Accordingly, natural gas demands during construction would be less than significant.

Transportation Energy

Project construction would consume energy in the form of petroleum-based fuels associated with use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., for deliveries of construction supplies and materials).

The petroleum-based fuel use summary provided in **Table 6-10** represents the amount of transportation energy that could potentially be consumed during construction based on a conservative set of assumptions. As shown, the Project would consume approximately 1,028,488 gallons of petroleum-based fuel (612,509 gallons of diesel fuel and 415,979 gallons of gasoline) throughout the construction period. For purposes of comparison, the Energy Information

Administration (EIA) forecasts a national oil supply of 17.8 million barrels (mb) per day in 202, which is the first year of construction for the Project.³⁰ This equates to approximately 6,497 mb per year or 272,3874 million gallons (mg) per year. Construction of the Project would account for less than 0.01 percent of the projected annual oil supply in 2026.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure. The Project would also comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel-fueled, commercial vehicles be limited to five minutes at any location. As a result, the Project would not result in inefficient, or unnecessary consumption of transportation resources during construction. Accordingly, transportation resource demands during construction would be less than significant.

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

Operation

During operation of the Project, energy would be consumed for multiple purposes associated with the proposed uses, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during operation of the Project in the form of water usage, solid waste disposal, and vehicle trips, among others. *Subsection XIX: Utilities and Service Systems*, details the Project's electricity and natural gas usage during operation as provided by the Project's Utility Infrastructure Technical Reports.^{31,32} As shown in **Table 6-24** and **Table 6-26**, the Site 2 Development would consume approximately 3,841,048 kWh of electricity per year, and the Site 3 Development would consume approximately 5,575,119 kWh of electricity per year. As such, the Project would consume a total of 11,329,890 kWh of electricity per year. As shown in **Table 6-25** and **Table 6-27**, Site 2 Development would consume approximately 5,754,771 cubic feet (cf) of natural gas per year, and Site 3 Development would consume approximately 7,997,526 cf of natural gas per year. As such, the Project would consume a total of 13,752,297 cf of natural gas per year. **Table 6-11: Summary of Petroleum-Based Fuel Use During Operation**, shows the petroleum-based fuel usage for the Site 2 and 3 Developments. As shown in **Table 6-11**, the Project would consume

³⁰ US Energy Information Administration, "Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition," <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0>, accessed April 2024.

³¹ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

³² KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

690,581 gallons of petroleum-based fuel (107,348 gallons of diesel fuel and 583,233 gallons of gasoline) per year during operation.

**TABLE 6-11
SUMMARY OF PETROLEUM-BASED FUEL USE DURING OPERATION**

Fuel Type	Quantity
<i>Diesel</i>	
Site 2 and Site 3	107,348 gallons
<i>Gasoline</i>	
Site 2 and Site 3	583,233 gallons

Source: Refer to **Appendix D** for detailed energy calculations.

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

Electricity

A Will Serve Letter was received by LADWP stating that electric service is available and adequate capacity for the proposed Project has been calculated as part of the total load growth forecast for the City.^{33,34} As a result, the Project would not result in inefficient, or unnecessary consumption of electricity during operation. Accordingly, electricity demand during operation would be less than significant.

Natural Gas

A Will Serve Letter was received by SoCalGas stating that gas service is available and adequate capacity for the proposed Project has been calculated as part of the total load growth forecast for the City.^{35,36} As a result, the Project would not result in inefficient, or unnecessary consumption of natural gas during operation. Accordingly, natural gas demand during operation would be less than significant.

Transportation Energy

The Project would be well-served by mass transit, including multiple nearby bus lines, and is located in both a TPA and HQTA. The Project would include bicycle parking facilities adjacent to the entrance on Margo Street. The Project would create a pedestrian-friendly environment by providing a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons and a

³³ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

³⁴ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

³⁵ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

³⁶ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

pedestrian plaza space at the corner of the 11th Street and Olive Street frontages adjacent to the Project's commercial uses. The Project would provide Metro mass transit riders access to the existing Metro light-rail station, extensive bus network that services the Site, and the proposed Los Angeles Streetcar, planned to service 11th Street in South Park. In addition to these mass transit options, the Project Sites are located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. These features would serve to reduce transportation fuel consumption.

The operation of the Project would generate vehicle trips associated with people driving to Sites 2 and 3 for work or home and driving to and from work and other destinations throughout the region. Based on the trip generation rates provided in the Project's *Transportation Assessment* (**Appendix J.1**) as well as the estimate of VMTs that would be generated by the Project, it is estimated that operation of the Site 2 Development would result in approximately 7,906,786 VMT on an annual basis, and the Site 3 Development would result in approximately 10,722,143 VMT on an annual basis. This would result in a total of 18,628,929 VMT with an estimated annual consumption of approximately 690,581 gallons of petroleum-based fuel, as shown in **Table 6-11** above.

For purposes of comparison, the U.S. Energy Information Administration (EIA) forecasts a national oil supply of 17.8 mb per day in 2031, which is the final opening year for the Project.³⁷ This equates to approximately 6,497 mb per year or 272,874 mg per year. Operation of the Project would account for less than 0.01 percent of the projected annual oil supply in 2031. The Project would not result in inefficient, or unnecessary consumption of energy resources for transportation during operation and the impact of the Project would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain any mitigation measures applicable to energy resources.

Project-Specific Mitigation

No additional mitigation measures are necessary.

³⁷ US Energy Information Administration, "Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition," <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0>, accessed December 2021.

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

4. The degree to which the project complies with existing energy standards;

Electricity

Less than Significant Impact. The 2017 Power Strategic Long-Term Resource Plan (SLTRP)³⁸ document serves as a comprehensive 20-year roadmap that guides the LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The 2017 SLTRP re-examines and expands its analysis on the 2016 Final Power Integrated Resource Plan (IRP) recommended case with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent renewable portfolio standard by 2050.

The 2017 SLTRP provides detailed analysis and results of several new IRP resource cases which investigated the economic and environmental impact of increased local solar and various levels of transportation electrification. In analyzing the IRP cases and recommending a strategy to best meet the future electric needs of Los Angeles, the SLTRP uses system modeling tools to analyze and determine the long-term economic, environmental, and operational impact of alternative resource portfolios by simulating the integration of new resource alternatives within our existing mix of assets and providing the analytic results to inform the selection of a recommended case.

The SLTRP also includes a general assessment of the revenue requirements and rate impacts that support the recommended resource plan through 2037. While this assessment will not be as detailed and extensive as the financial analysis to be completed for the ongoing rate action for the 2018/19 fiscal year and beyond, the SLTRP clearly outlines the general requirements. As a long-term planning process, the SLTRP examines a 20-year horizon in order to secure adequate supplies of electricity. In that respect, it is LADWP's desire that the SLTRP contribute towards future rate actions by presenting and discussing the programs and projects required to fulfill the Los Angeles City Charter mandate of delivering reliable electric power to the City of Los Angeles.

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

The Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code and the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond

³⁸ LADWP, *2017 Power Strategic Long-Term Resource Plan*, December 2017.

those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project Site's energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Site 2 and 3 Developments. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Site 2 and 3 Developments are part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.^{39,40} Moreover, LADWP plans to increase renewable energy sources to meet the City's goals for a clean energy future. Specifically, the goals include supplying 55 percent of power retail sales from renewable energy resources by 2025, 80 percent by 2036, and 100 percent by 2045, as well as achieve a carbon neutral power system by 2050.⁴¹

The Project would be designed and constructed to incorporate environmentally sustainable design features that would reduce energy and water usage. Specifically, the Project would include:

PDF-ENG-1: Energy efficient lighting fixtures.

PDF-ENG-2: ENERGY Star rated appliances for residential dwelling units.

PDF-ENG-3: Low-flow water features.

PDF-ENG-4: Energy efficient mechanical heating and ventilation systems.

All of these characteristics would serve to reduce the Project's consumption of electricity, consistent with State and local regulations and goals. As such, the Project's electricity usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

5. The effects of the project on energy resources;

Natural Gas

The *2020 California Gas Report*⁴² presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035. This report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with California Public Utilities Commission Decision D.95-01-039. The projections in the California Gas Report

³⁹ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

⁴⁰ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

⁴¹ LADWP, "Renewable Energy Program," https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_adf.ctrl-state=n5qya6spv_4&_afLoop=100538317667626, accessed December 2021.

⁴² California Gas and Electric Utilities, *2020 California Gas Report*, 2020.

are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities.

California natural gas demand is expected to decrease at a rate of 1 percent per year through 2035. The forecast decline comes from reduced gas demand in the major market segment areas of residential, electric generation (EG), commercial, and industrial. Statewide residential gas demand is projected to decrease at an average rate of 1.7 percent each year. EG gas demand is projected to decrease at an average annual rate of 1.5 percent each year. The commercial segment gas demand, which includes both core and noncore commercial demand, is projected to decrease at an average annual rate of 1.5 percent each year.⁴³

As discussed above, the Project Site would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the L.A. Green Building Code which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. Specifically, the addition of more electric based appliances, and implementation of energy efficient insulation features in buildings would reduce natural gas demand for the Project. As discussed above, natural gas service is available and would be provided to Sites 2 and 3. The availability of natural gas is dependent upon adequate supplies. The estimated natural gas demand for the Project is part of the total load growth forecast has been taken into account in projected growth by SoCal Gas.^{44,45} As such, the Project's natural gas usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

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

Transportation Energy

SCAG's *2016–2040 RTP/SCS* focused on creating viable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most crucial to the future of the region. The *Connect SoCal 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 include several project design features to decrease reliance on fossil fuels. As discussed previously, the Project would be well-served by mass transit, including multiple nearby bus lines, and is located in both a TPA and HQT. The Project would include bicycle parking facilities adjacent to the entrance on Margo Street. The Project would create a pedestrian-friendly

⁴³ California Gas and Electric Utilities, *2020 California Gas Report*, 2020.

⁴⁴ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

⁴⁵ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

environment by providing a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons and a pedestrian plaza space at the corner of the 11th Street and Olive Street frontages adjacent to the Project's commercial uses. The Project would provide Metro mass transit riders access to the existing Metro light-rail station, extensive bus network that services the Site, and the proposed Los Angeles Streetcar, planned to service 11th Street in South Park. In addition to these mass transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. These features would serve to reduce VMT and associated transportation fuel consumption, consistent with the goals of *Connect SoCal 2020–2045 RTP/SCS*.

In addition, vehicles used during construction activities would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations which indirectly reduces the consumption of petroleum-based fuels. During the operational lifetime of the Project, newer vehicles sold on the market would be required to comply with Corporate Average Fuel Economy (CAFE) fuel economy standards expected to incrementally take effect. Accordingly, fuel consumption is anticipated to decrease each year through implementation of regulation that require higher energy efficiencies and higher efficient and alternative fueled vehicles.

Conclusion

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the L.A. Green Building Code which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. Based on the discussion above, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and, therefore, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRs

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain any mitigation measures applicable to energy resources.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less than Significant Impact. During project construction and operation and other future development projects, Site 2 and Site 3 would incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Moreover, the Project would be consistent with growth expectations for the region and would be within the service capabilities of energy utility providers.^{46,47} 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; therefore, cumulative energy impacts would be less than significant.

⁴⁶ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

⁴⁷ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

VII. GEOLOGY AND SOILS

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. **Would the project expose people or structures to 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, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

Fault rupture is the surface displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) designates faults as active, potentially active, or inactive. The Alquist-Priolo Earthquake Fault Zoning Act establishes standards regulating development adjacent to active faults and areas designated as Earthquake Fault Zones. In addition, the City designates Fault Rupture Study Zones on each side of active and potentially active faults to establish areas of hazard potential. There are several principal active faults located in the Southern California metropolitan region including the San Andreas Fault, approximately 35 miles northwest of Downtown Los Angeles. Several additional active faults traverse the populated areas of Los Angeles County, including the Sierra Madre Fault, traversing across parts of Altadena and other foothill communities; the Raymond Fault which crosses the City of San Marino; and the Hollywood and Santa Monica Faults, which travel along the southern edge of the Hollywood Hills and Santa Monica Mountains.

Less than Significant Impact. The Project Site is not within a State-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards.^{48,49} No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the proposed Site 2 and 3 Developments is considered low. However, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The Project's *Geotechnical Investigations (Appendix E.1)* found no active or potentially active faults close enough to the Project Site to produce fault rupture or surface displacement at Site 2 or 3. The nearest fault to the Project Site is the Newport-Inglewood Fault Zone, which is located approximately 6 miles west-southwest of the Sites. Although the Project is not in close proximity to an active fault, the Project would be required to implement 2022 (effective January 1, 2023) California Building Code standards which include seismic design criteria. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low

⁴⁸ California Department of Conservation, "California Geological Survey," <https://maps.conservation.ca.gov/cgs/gmc/App/>, accessed December 21, 2021.

⁴⁹ City of Los Angeles, Department of City Planning, *General Plan*, "Safety Element," Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed December 21, 2021.

and potential impacts during construction and operation of the Project would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant potential adverse effects on people or structures. As no significant potential adverse effects on people or structures have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- ii. Strong seismic ground shaking, caused in whole or in part by the project's exacerbation of the existing environmental conditions?*

Less than Significant Impact. The Project would have a significant impact related to geology and soils if the Project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be lessened if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The closest active fault to the Project Site is the Newport-Inglewood Fault Zone located approximately 6 miles to the west-southwest. However, the Project Site is not located within a seismic hazard zone for land sliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.

The active San Andreas Fault Zone is located approximately 35 miles northeast of the site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Coastal Plain at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. These thrust faults and others in the Los Angeles area do not present a potential surface fault rupture hazard at the Project Site. However, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the Project Site.

Given the Project Site location in a seismically active region, they could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be lessened if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Moreover, according to the *Geotechnical Investigations* (see **Appendix E.1**), neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented herein are followed and implemented during design and construction. The Project would be required to comply with current engineering standards including the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the LAMC, and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letters (see **Appendix E.2**) for the Project.

Therefore, with compliance with applicable regulations and implementation of the recommendations in the *Geotechnical Investigations* and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letters for the Project, construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. As such, impacts associated with seismic ground shaking would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained a mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant potential adverse effects on people or structures. As no significant potential adverse effects on people or structures have been identified, the mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine,

clean sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

According to the City's General Plan and the City's Zone Information and Map Access System (ZIMAS), the Project Site is not located within an area susceptible to liquefaction.⁵⁰ The analysis completed for the *Geotechnical Investigations* concluded that the soils underlying the Project Site is not prone to liquefaction during a major seismic event based on their dense nature and a historically high groundwater depth (see **Appendix E.1**). Therefore, construction and/or operation of the Project would not exacerbate existing environmental conditions and cause or accelerate geologic hazards related to liquefaction, which could result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. As such, impacts associated with liquefaction would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant potential adverse effects on people or structures. As no significant potential adverse effects on people or structures have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site is located on relatively level terrain and no landslides are mapped in the vicinity of Site 2 or 3.⁵¹ According to the California Department of Conservation (DOC) Seismic Hazard Zones Map of the Hollywood Quadrangle⁵² and the City of Los Angeles *General Plan*,⁵³ the Project Site is not located in a designated earthquake-induced landslide hazard zone. Based on the results of the *Geotechnical Investigations*, the Project Site is not located within an area identified as having a potential for seismic slope instability (see **Appendix E.1**). The probability

⁵⁰ City of Los Angeles, Department of City Planning, *General Plan*, "Safety Element" (1996), Exhibit B: Areas Susceptible to Liquefaction.

⁵¹ City of Los Angeles, ZIMAS, "Parcel Profile Report," <http://zimas.lacity.org/>, accessed December 2021.

⁵² California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California* (1998).

⁵³ City of Los Angeles, Department of City Planning, *General Plan*, "Safety Element" (1990).

of seismically induced landslides occurring on the Project Site is very low due to the general lack of elevation difference in slope geometry across or adjacent to the Project Site. Development of the Project would not substantially alter the existing topography of Sites 2 and 3. Specifically, Sites 2 and 3 would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would result in the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur, and no mitigation measures are required.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained a mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant potential adverse effects related to landslides. As no significant potential adverse effects related to landslides have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. The Project Site is currently completely developed with impervious surfaces and does not contain any topsoil. Sites 2 and 3 and surrounding areas are disturbed and developed; the land is relatively flat and contains minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Future development is anticipated to include improvements that would conceal site soil; therefore, the potential for erosion is considered very low (see **Appendix E.1**).

During construction, activities such as excavation below ground surface, grading, and site preparation could leave soil at the Project Site susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Sites, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities.⁵⁴ The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best

⁵⁴ Environmental Protection Agency, “Stormwater Discharges from Construction Activities,” <https://www.epa.gov/npdes/stormwater-discharges-construction-activities>, accessed December 2021.

management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge in the form of an erosion control plan. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, diversions and berms, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Further, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil and impacts regarding soil erosion or the loss of topsoil would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020-2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant effects on soil erosion or topsoil. As no significant effects on soil erosion or topsoil have been identified, this mitigation measure from the SCAG *Connect SoCal 2020-2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

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

Less than Significant Impact. The liquefaction potential at the Project Site is considered to be remote (see **Appendix E.1**). Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general vicinity. Thus, the potential for subsidence due to withdrawal of fluids or gases to adversely impact Sites 2 and 3 is considered low.

The Project Applicant would be required by the LADBS, as part of the permitting process, to comply with the following Regulatory Compliance Measure:

RCM-GEO-1: As required by LAMC Section 91.7006, A final, design level, geotechnical, geologic, and seismic hazard investigation report that complies with all applicable state and local code requirements shall be prepared by a California-registered geotechnical engineer and shall be submitted to the LADBS. The final geotechnical, geologic, and seismic hazard investigation report would specify exact design coefficients, as well as the type and sizing of structural building materials, site preparation requirements, and foundation design requirements; and demonstrate that construction procedures would meet the established performance standards. The site-specific geotechnical report shall be prepared to the written satisfaction of LADBS.

Through compliance with the CBC and LABC, and with recommendations included in the final geotechnical report,⁵⁵ impacts related to geologic and soil instability would be less than significant. Based on the discussion above, development of the Project would not cause or exacerbate geologic hazards by being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and related impacts related to such matters would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant effects on existing environmental conditions. As no significant effects on existing environmental conditions

⁵⁵ Langan Engineering and Environmental Services, Inc., *Report of Geotechnical Engineering Services*, December 15, 2020, (see **Appendix E.1**).

have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?

Less than Significant Impact. Expansive soils generally result from specific clay minerals that expand when saturated and shrink when dry. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper management, heaving and cracking of both building foundations and slabs-on-grade could result. Based on the results of the *Geotechnical Investigations (Appendix E.1)*, soils present on the Project Site were determined to be generally non-expansive. The Project Site is described as being entirely urban, commercial land, with zero to five percent slopes.⁵⁶ The LADBS maintains design standards derived from the Building Code for building foundations on sites with expansive soils. The Project would be designed and constructed in conformance with current CBC and LABC requirements and the recommendations of the final geotechnical reports.⁵⁷ Thus, the Project would include foundations appropriate for the type of the soils at the Project Site and therefore would not create a substantial risk to individuals and/or property. Based on the discussion above, development of the Project would not cause or exacerbate geologic hazards and Project impacts with respect to expansive soils would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant effects on soil conditions. As no significant effects on soil conditions have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

⁵⁶ United States Department of Agriculture, Natural Resources Conservation Service, *Web Soil Survey*, "Soil Map, Los Angeles County, California, Southeastern Part (CA696)," <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>, accessed December 2021.

⁵⁷ Langan Engineering and Environmental Services, Inc., *Report of Geotechnical Engineering Services*, December 15, 2020, (see **Appendix E.1**).

Project-Specific Mitigation

No additional mitigation measures are necessary.

- 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 located in a developed area of the City that is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. As discussed in *Subsection XIX: Utilities and Service Systems*, the Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems.⁵⁸ Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to this issue would occur.

MITIGATION MEASURES**Mitigation from Prior EIRS**

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-1 applicable if the Lead Agency identified significant effects on wastewater. As no significant effects on wastewater have been identified, the mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant with Mitigation Incorporated. A significant impact could occur if grading or excavation activities associated with the Project were to disturb paleontological resources or geologic features that presently exist within the Project Site. Sites 2 and 3 have been previously graded and are not known to contain any unique paleontological resource or site or unique geologic feature. However, excavation of six subterranean levels is proposed on Sites 2 and 3; thus, excavation and grading could have a potentially significant impact on a unique paleontological resource or site or unique geologic feature. Additionally, with implementation of Mitigation Measure PMM GEO-2 from the SCAG *Connect SoCal 2020–2045 RTP/SCS*, impacts from the inadvertent discovery of unknown paleontological resources during substantial

⁵⁸ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy*, September 2021, **Appendix K**.

excavation and grading would be reduced to less than significant. In addition, the Project would be required to comply with existing regulations related to the inadvertent discovery of unknown paleontological resources, should they be encountered during ground disturbing activities. Specifically, the Project would be consistent with Section 5097.5 of the Public Resources Code which addresses the discovery and handling of paleontological resources. For these reasons, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GEO-2 is applicable if the Lead Agency identified significant effects on a unique paleontological resource or geological feature. Mitigation Measure PMM GEO-2 is not incorporated into the Project as the Project would comply with existing regulations that would be equally effective in avoiding impacts to paleontological resources, specifically **RCM-GEO-2**:

RCM-GEO-2: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project Site and any of the related projects, indicated in **Table 2-3**. Similar to the Project, potential impacts related to geology, soil, and paleontological resources would be assessed on a case-by-case basis and, if necessary, each of the related projects would be required to implement appropriate mitigation measures and compliance through the City's Building Code, which incorporates the Uniform Building Code and the California Building Code. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance measures recommended above, Project impacts would be reduced to less than significant levels. Therefore,

6.0 Sustainable Communities Environmental Analysis

the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

Impact Analysis

Introduction

GHG AND GLOBAL CLIMATE CHANGE BACKGROUND

Gases that trap heat in the atmosphere are called Greenhouse Gases (GHGs), since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the earth’s temperature. The State of California has undertaken initiatives designed to address the effects of GHGs, and to establish targets and emission reduction strategies for GHG emissions in California.

The principal GHGs are CO₂, CH₄, N₂O, SF₆, PFCs, HFCs, and H₂O. CO₂ is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, many of which set aggressive goals for GHG reductions within the State. Per SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project’s effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Assembly Bill 32 (Statewide GHG Reductions)

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the GHG emissions reduction goal for the State of California into law. As defined

under AB 32, GHGs include CO₂, CH₄, N₂O, SF₆, PFCs, HFCs, and H₂O. CO₂ is the reference gas for climate change because it is the predominant GHG emitted. AB 32 requires the CARB—the State agency charged with regulating Statewide air quality—to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020 by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

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

Executive Order S-3-05

Executive Order S-3-05, issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change. It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-30-15

In April 2015, Governor Brown signed Executive Order B-30-15, which established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. This Executive Order also directed all State agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 target, as well as the pre-existing, long-term 2050 target identified in Executive Order S-3-05. Additionally, the Executive Order directed CARB to update its Scoping Plan to address the 2030 target. These reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the Statewide level by State agencies, including the CARB, Public Utilities Commission, High Speed Rail Authority, and CEC. Executive Order B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new Statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB

to would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Climate Change Scoping Plan

CARB approved a Climate Change Scoping Plan (Scoping Plan) on December 11, 2008, as required by AB 32. The Scoping Plan proposed a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”⁵⁹ The Scoping Plan had a range of GHG reduction actions, including direct regulations; alternative compliance mechanisms; monetary and nonmonetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The Scoping Plan called for a “coordinated set of strategies” to address all major categories of GHG emissions.⁶⁰ Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard, and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. Established in 2002 under SB 1078, the California Renewables Portfolio Standards (RPS) were accelerated in 2006 under SB 107, which required that, by 2010, at least 20 percent of electricity retail sales come from renewable sources. In April 2016, the CEC updated the RPS pursuant to SB 350, intended to set the new target 50 percent renewables by 2030.⁶¹ This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

Subsequent to the adoption of the Scoping Plan, a lawsuit was filed challenging CARB’s approval of the Scoping Plan Functional Equivalent Document (Supplemental FED). On May 20, 2011 (Case No. CPF-09-509562), the court found that the environmental analysis of the alternatives in the Supplemental FED to the Scoping Plan was not sufficient under CEQA. CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the Supplemental FED

⁵⁹ CARB, *Climate Change Scoping Plan: A Framework for Change*, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed December 2021.

⁶⁰ CARB, *Climate Change Scoping Plan*, p. ES-7.

⁶¹ CEC, “Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations,” <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/rps-enforcement-regulations-publicly>, accessed December 2021.

to the Scoping Plan was approved on August 24, 2011. The Supplemental FED to the Scoping Plan indicated that the potential exists for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the Scoping Plan.

CARB updated the Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan⁶² adjusted the 1990 GHG emissions levels to 431 million metric tons of CO₂ equivalents (MMTCO_{2e}); the updated 2020 GHG emissions forecast is 509 MMTCO_{2e}, which credited for certain GHG emission reduction measures already in place (e.g., the RPS). The 2014 Scoping Plan also recommended a 40 percent reduction in GH emissions from 1990 levels by 2030, and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2017 Scoping Plan,⁶³ approved on December 14, 2017, builds on previous programs, and addresses the 2030 target established by the 2016 SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard and aims to reduce emissions of CH₄ and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

The most recent version is the 2022 Scoping Plan which was adopted by CARB on December 15, 2022. The 2022 Scoping Plan continues to outline a path to meet the previously set goal of 40 percent below 1990 levels by 2023, and it establishes a target of reducing emissions to 85 percent below 1990 levels by 2045. The Plan also focuses on achieving carbon neutrality by means of GHG reduction to meet emission targets as well as further expanding actions through a variety of approaches.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the GHG emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs. Cap-and-trade is a market-based regulation that is designed to reduce GHGs from multiple sources.

⁶² CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework* (May 2014).

⁶³ CARB, *California's 2017 Climate Change Scoping Plan*, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed December 2021.

Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Project would be exempt from the Cap-and-Trade program since it only proposes residential and commercial uses and does not propose any industrial or high-emitting land uses. On July 2018, CARB recently announced that GHG pollution in California fell below 1990 levels, which was the 2020 GHG goal passed by AB 32.⁶⁴

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California SB 1078 and accelerated in 2006 under California SB 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010. On April 2, 2011, Governor Jerry Brown signed California SB 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Senate Bill 375

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.⁶⁵ The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

Sustainable Communities Strategy

The County is a member agency of SCAG. SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of

⁶⁴ CARB, "Climate Pollutants Fall Below 1990 Levels for First Time," <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time>, accessed December 2021.

⁶⁵ California Legislative Information, *Senate Bill No. 375*, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375, accessed December 2021.

regional issues related to transportation, the economy, community development, and the environment. As the federally designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),⁶⁶ SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG has prepared and adopted the *Connect SoCal 2020–2045 RTP/SCS*,⁶⁷ which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG *Connect SoCal 2020–2045 RTP/SCS* is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 as compared to the 2005 level.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO_{2e} per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

City of Los Angeles Sustainable City pLAn/L.A.'s Green New Deal

The City began addressing the issue of global climate change by pushing Green L.A., *An Action Plan to Lead the Nation in Fighting Global Warming* (L.A. Green Plan/ClimateLA) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. In 2008, the City released an implementation program for the L.A. Green Plan/ClimateLA, which provides detailed information about each action item discussed in the L.A. Green Plan/ClimateLA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City

⁶⁶ California Health and Safety Code, *Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b)*.

⁶⁷ SCAG, *Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies Draft*, “Chapter 1,” <https://www.connectsocial.org/Pages/Connect-SoCal-Draft-Plan.aspx>, accessed December 2021.

buildings, to converting the City's fleet vehicles to cleaner and more efficient models and reducing water consumption.

On April 8, 2015, Mayor Eric Garcetti released Los Angeles' first ever Sustainable City pLAN (The pLAN). The pLAN sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAN is made up of short term (by 2017) and long-term (2025 and 2035) targets. The pLAN set out an ambitious vision for cutting GHG emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicles as well as renewable energy and GHG accounting. L.A. has already reduced its GHG emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

Since 2015, Mayor Garcetti has released an expanded vision for the Sustainable City pLAN, called L.A.'s Green New Deal. Released in 2019, the update to the Sustainable City pLAN sets new energy efficiency and sustainability goals that will transition the City of Los Angeles to a more resilient, sustainable, and equitable energy future. Actionable goals include increasing the green building standard for new construction, create benchmarking policies for building energy use, develop "blue, green, and black" waste bin infrastructure, reduce water use by 20 percent, and require LEED Silver or better for new construction. That future will be realized, in part, by the 2050 targets that are spelled out in the plan that include goals for: renewable energy, local water, clean and healthy buildings, housing and development, mobility and mass transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, environmental justice, prosperity and green jobs, and lead by example.

In 2019, the first four-year update to the 2015 Sustainable City pLAN was released. Although not a formally adopted plan or policy, but rather a mayoral initiative, the updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals.⁶⁸ L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.

L.A. Green Building Code

The City of Los Angeles L.A. Green Building Code (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent

⁶⁸ City of Los Angeles, *L.A.'s Green New Deal, Sustainable City pLAN*, 2019.

with Statewide goals and policies in place for the reduction of GHG emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures, the L.A. Green Building Code requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20 percent, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New related projects are required to comply with the L.A. Green Building Code, and therefore are generally considered consistent with Statewide GHG-reduction goals and policies, including SB 32.

GHG SIGNIFICANCE THRESHOLD

CEQA Guidelines Section 15064.4 states that lead agencies shall have discretion to determine, in the context of a particular project, whether: (1) to use a model or methodology to quantify a project's GHG emissions; and/or (2) to rely on a qualitative analysis or performance-based standards. Section 15064.4 further states that a lead agency should consider specific factors, among others, when assessing the significance of GHG emission on the environment, including: (a) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (b) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (c) the extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHGs. CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds.

CEQA Guidelines Section 15130(f) clarifies that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. Examples of such programs include "plans or regulations for the reduction of greenhouse gas emissions."

In the absence of any adopted, numeric threshold, the City evaluated the significance of the Project's potential GHG emissions consistent with CEQA Guidelines Section 15064.4(b)(2). As such, a significant impact would occur if the Project conflicts with the applicable policies and/or regulations outlined in the L.A. Green Building Code, L.A. Green Plan/ClimateLA, Sustainable City pLAn/L.A.'s Green New Deal, and SCAG's *Connect SoCal 2020–2045 RTP/SCS*.

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

Construction

Less than Significant Impact. Construction activity impacts are relatively short in duration, and they contribute a relatively small portion of the total lifetime GHG emissions of a project. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, no basis exists for concluding that the Project's very small and essentially temporary (primarily from construction) increase in emissions could cause a measurable increase in global GHG emissions necessary to force global climate change. In addition, GHG emissions-reduction measures for construction equipment are relatively limited.⁶⁹ Therefore, in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*,⁷⁰ the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. That method is used in this analysis.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's CalEEMod model. CalEEMod is based on outputs from the CARB off-road emissions model (OFFROAD) and the CARB on-road vehicle emissions model (EMFAC), which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles (refer to **Appendix A.1** through **Appendix A.3** for construction equipment inventory list).

The forecasting of construction-related GHG emissions requires assumptions regarding the timing of construction as the emission factors for some of the Project's construction-related GHG emission sources decline over time. As shown in **Table 6-12: Construction GHG Emissions**, total construction emissions for the Site 2 Development would be 2,941 MTCO₂e, and total construction emissions for the Site 3 Development would be 3,477 MTCO₂e. As such, construction of the Project would result in a total of 6,418 MTCO₂e. One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new building requires its first major renovation.⁷¹ As shown in **Table 6-12**, when amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 213 MTCO₂e per year.

⁶⁹ SCAQMD, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008.

⁷⁰ SCAQMD, "Greenhouse Gases (GHG)," <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2>, accessed December 2021.

⁷¹ International Energy Agency (IEA), *Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings*, IEA Information Paper (2008).

**TABLE 6-12
CONSTRUCTION GHG EMISSIONS**

Construction Phase	MTCO₂e/Year
Site 2	
2024	1,125
2025	1,260
2026	556
Site 2 Total	2,941
Site 3	
2025	30
2026	1,571
2027	1,323
2028	553
Site 3 Total	3,477
Overall Total	6,418
30-Year Annual Amortized Rate	213

Source: Refer to **Appendix A.1: Site 2 Air Quality and GHG Modeling Data** and **Appendix A.2: Site 3 Air Quality and GHG Modeling Data**.

Notes: GHG = greenhouse gas; MTCO₂e = metric tons of CO₂

Operation

The operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from Sites 2 and 3. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table 6-13: Operational GHG Emissions** below. Area source emissions are generated by maintenance and landscaping equipment and products; energy sources are associated with energy usage to support building operations; mobile sources are generated by vehicle trips associated with the Project,

As shown in **Table 6-13**, average annual operational emissions from the Site 2 and Site 3 Development would be 7,045 MTCO₂e per year. Total average annual operational emissions for the Project would be 7,258 MTCO₂e per year, including amortized construction emissions. These estimates are based on CalEEMod output data that assumes compliance with current building codes and SCAQMD rules as well as project design features, however it does not include any mitigation measures.

**TABLE 6-13
OPERATIONAL GHG EMISSIONS**

Source	MTCO ₂ e/Year
Site 2 and Site 3	
Area	287
Energy	2,592
Mobile	3,707
Waste	318
Water	141
Total	7,045
Construction Emissions (Amortized)	213
Overall Total	7,258

*Source: Refer to Appendix A.3: Site 2 and Site 3 Air Quality and GHG Modeling Data.
Notes: GHG = greenhouse gas; MTCO₂e = metric tons of CO₂*

It should be noted that each source category of GHG emissions from the Project would be subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- **Stationary and Area Sources**: Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- **Energy**: Both construction and operational activities associated with the Project would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- **Transportation**: Both construction and operational activities associated with the Project would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
- **Building Structures**: Operational efficiencies would be incorporated into the Project that reduce energy use and waste, as mandated by the L.A. Green Building Code, such as use of energy efficient windows and construction materials.
- **Water and Wastewater use**: The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- **Major appliances**: The Project would include major appliances that are regulated by CEC requirements for energy efficiency.
- **Solid Waste Management**: The Project would be subject to solid waste diversion policies that reduce GHG emissions, such as the City's recycling program.

As discussed under Threshold b below, the Project adheres to regulatory compliance measures that would further reduce the Project's GHG emissions profile. The reduction in the GHG

emissions shows that the Project would not conflict with applicable plans including the L.A. Green Building Code, L.A. Green Plan/ClimateLA, and the SCAG *Connect SoCal 2020–2045 RTP/SCS*. In addition, the mixed-use nature of the Project and its proximity to mass transit would further reduce what emissions are produced through the above regulations and applicable air quality plans. As such, the Project would have a less than significant direct or indirect GHG impact on the environment.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM GHG-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not incorporated into the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional project-specific mitigation measures are necessary.

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. Below is a discussion of the Project’s consistency with relevant plans and policies that govern climate change that would demonstrate how the Project would not conflict with any applicable plans, policies, or regulations to further reduce GHG.

CLIMATE CHANGE SCOPING PLAN

Table 6-14: Project Consistency with Climate Change Scoping Plan contains a list of GHG-reducing strategies set forth in the Climate Change Scoping Plan that are applicable to the Project. The analysis presented in **Table 6-14** describes the Project’s compliance and consistency with these strategies as outlined in the State’s Climate Change Scoping Plan to reduce GHG emissions. As shown in **Table 6-14**, the Project would not conflict with the policies included in the Climate Change Scoping Plan.

**TABLE 6-14
PROJECT CONSISTENCY WITH CLIMATE CHANGE SCOPING PLAN**

Regulation, Actions, and Strategies	Responsible Party(ies)	Proposed Project Consistency Analysis
California Code of Regulations (CCR), Title 20: The 2016 Appliance Efficiency Regulations, adopted by the	State and CEC	No Conflict. The Project would develop new buildings that would be outfitted with appliances and lighting that comply with

Regulation, Actions, and Strategies	Responsible Party(ies)	Proposed Project Consistency Analysis
California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.		CEC’s standards. These standards are included in the default parameters provided in CalEEMod and are reflected in the estimated Project-related GHG emissions.
CCR, Title 24, Building Standards Code: The 2019 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.		No Conflict. Consistent with regulatory requirements, the Project would comply with applicable provisions of the California Green Building Standards Code.
The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	State and CEC	
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. ^b	State/ Manufacturers	No Conflict. The Project would not conflict with the requirements under AB 1109 because it would comply with local and state green building programs and incorporates energy efficient lighting and other required measures that would reduce electricity consumption.
By 2019, develop pricing policies to support low- GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	CalSTA, Caltrans, CTC, OPR/SGC, CARB	No Conflict. The Project would not conflict with this policy as this policy would not be implemented at the project level.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	State	No Conflict. Consistent with regulatory requirements, the Project would comply with applicable provisions of the California Green Building Standards Code.
CARB In-Use Off-Road Regulation: CARB’s in-use off-road diesel vehicle regulation (“Off-Road Diesel Fleet Regulation”) requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	CARB	No Conflict. Construction contractors that would comply with this regulation would be used throughout Project development.

Regulation, Actions, and Strategies	Responsible Party(ies)	Proposed Project Consistency Analysis
<p>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 and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.^a</p>	<p>CARB</p>	<p>No Conflict. Construction contractors that would comply with this regulation would be used throughout Project development.</p>
<p>Implement the Short-Lived Climate Pollutant Strategy by 2030: 40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. 50-percent reduction in black carbon emissions below 2013 levels.</p>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p>No Conflict. Senate Bill 605 (SB 605) was adopted in 2014 which directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.^b The Project would comply with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.</p>
<p>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</p>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p>No Conflict. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. In October 2020, CalRecycle released the proposed regulation text for the Short-lived Climate Pollutants (SLCP): Organic Waste Reductions program.^c</p> <p>Compliance with AB 341 (Mandatory Commercial and Multi-Family Recycling, 2012) would also help achieve the goals of SB 1383. The Project would not conflict with AB 341 which requires not less than 75 percent of solid waste generated be source reduced through recycling, composting or diversion. Reduction in solid waste generated by the Project would reduce overall GHG emissions.</p>

^a CARB, *Truck and Bus Regulation—On-Road Heavy Duty Diesel Vehicles (In-Use) Regulation*.

^b CARB, *Reducing Short-Lived Climate Pollutants in California*.

^c CalRecycle, *Short-Lived Climate Pollutants (SLCP): Organic Waste Reductions Proposed Methane Emissions Reductions, Proposed Regulation Text, October 2020*.

Consistency with L.A. Green Building Code

The Project would comply with the L.A. Green Building Code. Through this compliance the Project's GHG emissions would be reduced by increasing energy efficiency, reducing indoor and outdoor water demand, installing energy-efficient equipment, and complying with 2019 California Title 24 Building Energy Efficiency Standards. The Project would also meet the 2019 mandatory measures of the CALGreen Code and the L.A. Green Building Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC systems would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. CalGreen incorporates and overlaps with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. Therefore, the Project would not conflict with the L.A. Green Building Code.

Sustainable City pLAN/L.A.'s Green New Deal

Although the Sustainable City pLAN and Green New Deal are not adopted plans that are directly applicable to private development projects, the Project would benefit from the City's commitment to the goal and aspirations outlined in these documents. An overview of how the Project relates to actions and measures contained in the Green New Deal is contained in **Table 6-15**, below.

**TABLE 6-15
CONSISTENCY WITH APPLICABLE GHG EMISSIONS GOALS
AND ACTIONS OF LA'S GREEN NEW DEAL**

Action	Description	Consistency Analysis
Focus Area: Renewable Energy		
<p>Increase cumulative MW by 2025; 2035; and 2050 of:</p> <ul style="list-style-type: none"> • Local solar to 900- 1,500 MW; 1,500-1,800 MW; and 1,950 MW. • Energy storage capacity to 1,654-1,750 MW; 3,000 MW; and 4,000 MW. • Demand response (DR) programs to 234 MW (2025) and 600 MW (2035). 	<p>The City would provide community solar programs for low income and renter households. The City would launch a “Virtual Net Energy Metering” program. The City would streamline permitting processes for energy storage projects and would pilot technology for dispatchable and customer-side storage. The City would investigate bidirectional smart-grid technologies to prepare for large-scale adoption of EVs. The City would implement a communication network to enable use of smart meters.</p>	<p>No Conflict. These actions apply to the City. The Project would be built according to CALGreen and CEC requirements regarding photovoltaic systems and solar readiness. The Project would also include EV parking spaces, which would help leverage the City’s commitment to EV- related smart-grid technology improvements.</p>
Focus Area: Local Water		
<p>Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050.</p>	<p>The City would build upon the success of the Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs.</p>	<p>No Conflict. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce water use. The Project would be built consistent with relevant California Plumbing Code, CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code standards that apply at the time of the Project’s permitting.</p>
Focus Area: Clean and Healthy Buildings		
<p>All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.</p>	<p>The City would perform a complete building electrification study and develop supporting programs. Financing and incentives would be expanded in existing energy efficiency and solar incentive programs.</p>	<p>No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet the applicable requirements of CALGreen and the Los Angeles Green Building Code. The Project would be subject to the latest Title 24 Standards or future standards, which are a</p>

Action	Description	Consistency Analysis
		major step towards achieving future zero net energy goals.
Reduce building energy use per square feet for all building types 22% by 2025; 34% by 2035; and 44% by 2050.	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy- water nexus.	No Conflict. While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of CALGreen and the Los Angeles Building Code.

Focus Area: Mobility and Public Transit

Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35% by 2025; 50% by 2035; and maintain at least 50% by 2050.	The City would launch a regionally coordinated working group of mobility partners to encourage shared, sustainable mobility options. The City would support the implementation of a congestion pricing pilot. The City would identify opportunities to improve pedestrian comfort and update City standard plans for public works projects to integrate pedestrian-centric design into applicable projects. The City would implement Vision Zero safety improvements. The City would improve travel time on the County bus network by 30 percent by expanding DASH service and executing a suite of bus and transit corridor facility improvements. The City would continue to buildout out its subway and light rail network. The City would expand the bike land network by 20 lane-miles per year and increase bicycle-supportive infrastructure like public bicycle parking. The City would expand electric car sharing options.	No Conflict. This action primarily applies to the City. However, the Project would be supportive of this action. The Project would be located in a HQTA, TPA, and a Pedestrian Enhanced District. The Project would also provide 524 bicycle parking spaces for residential and commercial users. As discussed, these and other factors would increase transit and active mode share.
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Action	Description	Consistency Analysis
<p>Reduce Vehicle Miles Travelled (VMT) per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050.</p>	<p>The City would update the Transportation Demand Management (TDM) ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to ease congestion. The City would launch a user-friendly searchable app mapping all curbside designations throughout the City. It would also expand the Metro Bike Share program to at least three new neighborhoods.</p>	<p>No Conflict. Same as above.</p>

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

Consistency with SCAG RTP/SCS

SCAG's *Connect SoCal 2020–2045 RTP/SCS* is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 as compared to the 2005 level. Consistency with the policies of the *Connect SoCal 2020–2045 RTP/SCS* is described in detail in **Section 3.0: Sustainable Communities Environmental Assessment Criteria** of this document.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the *Connect SoCal 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 *Connect SoCal 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, strategies and policies set forth in the *Connect SoCal 2020–2045 RTP/SCS* can be grouped into the following two categories: (1) integrated growth forecast; and (2) reduction of vehicle trips and VMT.

Integrated Growth Forecast

The *Connect SoCal 2020–2045 RTP/SCS* provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. According to the SCAG estimates, the 2016 population within the City was 3,933,800 residents and 1,848,300 employment opportunities. Based on the current draft forecasts, the population and employment projection for the year 2045 is 4,771,300 and 2,135,900, respectively. As discussed in *Subsection XIV: Population and Housing*, construction of 536 units on the Site 2 Development, and 713 units on the Site 3 Development would result in an increase of approximately 3,398 residents in the City. The addition of approximately 3,398 people generated by the Project would be less than 1 percent of the SCAG's population growth forecasts for the City. Moreover, it was estimated that approximately 52 employees would be supported under the proposed Project with Site 2 and Site 3 combined.⁷² This would constitute a negligible increase within the expected 2,135,900 employees within the SCAG region by 2045.

⁷² Gibson Transportation Consulting, *Transportation Assessment*, December 2019, **Appendix J.1**.

Consistency with VMT Reduction Strategies and Policies

The SCS's goals and policies to reduce VMT focus on transportation and land use planning that include building mixed-use projects, locating residents closer to where they work and play, and designing communities so there is access to high quality mass transit service. The SCS identifies transportation network actions and strategies that are outside the City's jurisdiction and control, such as expanding the use of transit modes in sub-regions (e.g., bus rapid transit (BRT), rail, limited-stop service, and point-to-point express service utilizing the high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lane networks). In areas without quality mass transit, the SCS identifies land use strategies to promote development patterns that result in fewer vehicles miles traveled and thus lower GHG emissions. Such land use strategies including local government adoption of updated zoning codes, General Plans, and other regulatory policies that promote neighborhood-oriented development, suburban villages, and revitalized main streets consistent with the *Connect SoCal 2020–2045 RTP/SCS*.

OPR issued proposed changes to the CEQA Guidelines.⁷³ These changes state that projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor (HQTC) generally may be considered to have a less than significant transportation impact. As discussed previously, the Project would be well-served by mass transit, including multiple nearby bus lines provided by Metro and is located in both a TPA and HQTA. The Project would include bicycle parking facilities adjacent to the entrance on Margo Street. The Project would create a pedestrian-friendly environment by providing a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons and a pedestrian plaza space at the corner of the 11th Street and Olive Street frontages adjacent to the Project's commercial uses. The Project would provide Metro mass transit riders access to the existing Metro light-rail station, extensive bus network that services the Site, and the proposed Los Angeles Streetcar, planned to service 11th Street in South Park. In addition to these mass transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. As such, the Project would not conflict with the *Connect SoCal 2020–2045 RTP/SCS*.

As discussed above, the Project would not conflict with applicable plans including the L.A. Green Building Code, L.A. Green Plan/ClimateLA, and the SCAG *Connect SoCal 2020–2045 RTP/SCS*. Impacts would be less than significant.

⁷³ California Office of Planning and Research (OPR), *Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (January 20, 2016), http://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM GHG-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not applicable to the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional project-specific mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. To achieve Statewide goals, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. Currently, there is no generally accepted methodology that exists to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064 h(3), the City as a lead agency, has determined that the Project's contribution to cumulative GHG emission and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and polices to reduce GHG emissions. Accordingly, the analysis above considered the potential for the Project to contribute to the cumulative impact of global climate change. As stated above, the Project would not conflict with applicable plans including the Los Angeles Green Building Code, L.A. Green Plan/ClimateLA, and the SCAG *Connect SoCal 2020–2045 RTP/SCS*. As such, cumulative impacts would be less than significant during construction and operation.

IX. HAZARDS AND HAZARDOUS MATERIALS

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create significant hazard to public or 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 pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

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

Less than Significant Impact. A significant impact may occur if a project involves transport, use or disposal of hazardous materials as part of its routine operations and as a result would create a significant hazard to the public or environment. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those associated with residential and retail commercial uses (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids.

However, all potentially hazardous materials used during construction will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations.

The transport, use, and storage of hazardous materials during the construction and operation of the Project Site would be conducted in accordance with applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Additionally, the City would review plans prior to construction to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the Los Angeles City Fire Department (LAFD) to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials. Any associated risk would be reduced through compliance with these standards and regulations. Furthermore, there are no Aboveground Storage Tanks (AST's) and no Underground Storage Tanks (USTs) located on the Project Site.^{74,75} Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and no mitigation measures are required.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HAZ-1 that would apply if the Lead Agency identified significant effects on releasing hazardous materials into the environment. As no significant effects on releasing hazardous materials into the have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

⁷⁴ BA Environmental, *Phase I Environmental Site Assessment – Site 2*, June 2013, **Appendix F.1**.

⁷⁵ BA Environmental, *Phase I Environmental Site Assessment – Site 3*, June 2013, **Appendix F.2**.

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

The following section incorporates by reference information from the *Phase I Environmental Site Assessments* conducted for Site 2 and Site 3, both dated June 2013 and prepared by BA Environmental Services on behalf of the Applicant; the *Site Soil Mitigation Plan* for Site 2 (dated November 2022) and the *Site Soil Mitigation Plan* for Site 3 (dated September 2022), both prepared by BA Environmental on behalf of the Applicant (see **Appendix F**). Separate analysis is provided below for Sites 2 and 3 as different conditions are present on each site.

SITE 2

Less than Significant Impact With Mitigation Incorporated. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. The Site 2 Development would require demolition of the existing surface parking lot and construction of the proposed mixed-used building with grading for the 6 levels of subterranean parking. Grading and excavation for the proposed parking garage would include approximately 71 feet of excavation below grade and a removal 118,543 cubic yards of soil.

A Phase I ESA conducted in June 2013 for Site 2 determined this site was historically occupied by residences and apartments from prior to 1888 until prior to 1938. By 1938, the subject site was occupied by a parking lot, an apartment building, and a print shop. There continued to be no changes in use until approximately 1958, when the apartment building was demolished and replaced with a parking lot. Site 2 remained unchanged through the 1960s. By 1970, Site 2 was occupied by a restaurant and a parking lot. Around 2015, the restaurant building was demolished. Since the demolition of this building, Site 2 has been used as a parking lot.

A Limited Phase II Subsurface Investigation of Site 2 was conducted in February 2018 to determine if the historical uses, specifically the print shop, resulted in any contamination of soil and soil vapor. A Geophysical Survey was also conducted on the subject property to determine if any subsurface structures are present.

The Geophysical Survey included both a magnetic survey and use of Ground Penetrating Radar (GPR). The geophysical survey identified several magnetic and GPR anomalies which were interpreted as steel pipelines and other steel or steel-reinforced concrete structures such as possible building piles and other debris from former structures which occupied the subject property. Two GPR anomalies were identified as former basements. Both structures were identified as having voids within them. Besides the two former basements, two areas of potential subsurface foundations were noted in the GPR profiles.

None of the soil samples analyzed contained detectable concentrations of VOCs. Soil vapor samples collected contained low concentrations of 1,2,4-Trimethylbenzene, Chloroform, Trichlorofluoromethane, m,p-Xylene 0.052, Ethylbenzene, Methylene Chloride, Toluene and tetrachloroethene. Trichloroethene (TCE) was also detected in all the soil vapor samples. One soil vapor sample was reported to contain elevated concentrations of TCE. The low levels of vapor phase contaminants identified in subsurface soils were considered likely to be associated with the print shop that existed on the site at one time.

Further assessment of the two larger magnetic anomalies was recommended to physically identify these features. Additionally, it was recommended that the area identified as having elevated concentrations of TCE in the soil vapor be further assessed during construction.

A Site Soil Mitigation Plan (SMP) prepared for Site 2 in November 2022 identifies actions to be taken to address the potential for encountering contaminated soil, soil vapor, and subsurface structures during construction. **MM HAZ-1** requires that this SMP be implemented during construction. The SMP includes additional assessment of the five magnetic anomalies identified in the Phase II Subsurface Investigation. These anomalies were determined to be a large metallic structure, a steel reinforced concrete structure, a small steel pipeline structure and two former basements.

Actions identified in the SMP include stopping excavation and grading if any subsurface structures be encountered. The structure will be assessed, removed, and disposed of in accordance with any applicable local, State, or federal regulations. Subsequent to the removal of any subsurface structures, the soil beneath the structure will be assessed if determined to be necessary.

The SMP also identifies actions to be taken if any unusual odors are detected, or visibly contaminated or discolored soil is encountered during excavation and grading. The area where any unusual odors or contaminated or discolored soil is encountered will be assessed using either a photoionizing detector (PID) or flame ionizing detector (FID). Readings will be collected near ground surface as well as in the breathing zone. If PID or FID readings are 50 parts per million (ppm) or greater, work will stop, and the South Coast Air Quality Management District (AQMD) will be notified as required by AQMD Rule 1166. In addition, soil vapor and/or samples will be collected as warranted for further assessment. Any visibly impacted soil encountered during excavation or grading will be stored separately from clean soil. If contaminated soils encountered require excavation, a Soil Remediation Work Plan will be prepared and implemented, including collecting and analyzing samples to characterize any contamination to determine disposal requirements.

In addition, the Site is within a Methane Hazard Zone as indicated on the mapped by the City. This map identifies areas of potentially hazardous subsurface methane gas within Los Angeles city limits. These hazardous gas zones are usually a result of naturally surfacing tar and crude oil,

or shallow soil contamination by old drilling wells. As such, would be governed by the regulations per the City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. The Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City's building code and the project specific requirements within the final geological investigation that would be submitted to the LADBS during the building permit process. Compliance with City requirements would ensure that the project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment and impacts would be less than significant.

The Project Applicant would be required by the LADBS, as part of the permitting process, to comply with the following Regulatory Compliance Measure:

RCM HAZ-1: The Project shall include a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

SITE 3

Less than Significant with Mitigation Incorporated. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. The Project would require demolition of the existing surface parking lot and construction of the proposed mixed-used building with grading for the 6 floors of underground parking. Grading and excavation for the proposed parking garage would include approximately 73 feet of excavation below grade and removal of 156,232 cubic yards of soil.

A Phase I ESA conducted in December 1992 for Site 3 determined this site was historically occupied by a gasoline service station between 1935 and 1967 that had five underground storage tanks (USTs). Two 3,000-gallon USTs and three 550-gallon USTs were removed in 1967 along with a fuel dispenser island. There was no record of contaminated soil conditions being encountered during the removal.

A Phase II Subsurface Investigation of Site 3 was conducted in February 1993. Solis samples were collected and analyzed total recoverable petroleum hydrocarbons (TRPH), and benzene, toluene, ethylbenzene, and xylenes (BTEX) according to EPA Methods 8015 (modified for TRPH) and 8020 (BTEX). Indicated that TRPH existed in the former UST excavations at concentrations up to 16,000 parts per million (ppm) and low levels of toluene and xylenes were also encountered in several of the samples. The total volume of contaminated soil was estimated at approximately 250 cubic yards. A Remedial Action Plan (RAP) was prepared in 1994 to address removal and disposal of the contaminated soil. In March 1995, the contaminated soil was removed and

transported for disposal at the Bradley Landfill in Burbank. The Los Angeles City Fire Department issued a site closure letter in Mary 1995.

In February of 2018, a Limited Phase II Subsurface Investigation on the subject property to assess soil and soil vapor beneath the subject property to determine if they have been impacted by historical on-site operations. No soil samples were reported to contain any concentrations above laboratory detection limits for VOCs or TPH. Low levels of vapor phase contaminants have been identified in subsurface soils which are likely attributed to the former gasoline service station, automotive repair businesses and automotive body shops that historically occupied the site. Residual petroleum hydrocarbons contamination was detected in one soil boring.

The Geophysical Survey included both a magnetic survey and use of Ground Penetrating Radar (GPR). The geophysical survey identified several magnetic and GPR anomalies which were interpreted as steel pipelines and other steel or steel-reinforced concrete structures such as possible building piles and other debris from former structures which occupied the subject property. Two subsurface structures were reported to have a large-amplitude magnetic signature. Neither structure was interpreted as an underground storage tank. GPR profiles revealed two subsurface structures. Neither structure had a magnetic signature, nor a GPR profile indicative of a UST.

Further assessment of the two large magnetic anomalies was recommended to physically identify these features. Additionally, it was recommended that any petroleum hydrocarbon impacted soils encountered during excavation activities should be separated and properly disposed of in accordance with all local, state, and federal regulations.

A Site Soil Mitigation Plan (SMP) prepared for Site 2 in September 2022 identifying actions to be taken to address the potential for encountering contaminated soil, soil vapor, and subsurface structures during construction. **MM HAZ-1** requires that this SMP be implemented during construction. The SMP includes additional assessment of the two magnetic anomalies identified in the Phase II Subsurface Investigation. These anomalies were determined to be metallic structures, possibly debris, located approximately 3 feet below the ground surface. The GPR profile of these structures did not display a profile indicative of a UST.

Actions identified in the SMP include stopping excavation and grading if any subsurface structures be encountered. The structure will be assessed, removed, and disposed of in accordance with any applicable local, State, or federal regulations. Subsequent to the removal of any subsurface structures, the soil beneath the structure will be assessed if determined to be necessary.

The SMP also identifies actions to be taken if any unusual odors are detected, or visibly contaminated or discolored soil is encountered, during excavation and grading. The area where any unusual odors or contaminated or discolored soil is encountered will be assessed using either a photoionizing detector (PID) or flame ionizing detector (FID). Readings will be collected near

ground surface as well as in the breathing zone. If PID or FID readings are 50 parts per million (ppm) or greater, work will stop, and the South Coast Air Quality Management District (AQMD) will be notified as required by AQMD Rule 1166. In addition, soil vapor and/or samples will be collected as warranted for further assessment. Any visibly impacted soil encountered during excavation or grading will be stored separately from clean soil. If contaminated soils encountered require excavation, a Soil Remediation Work Plan will be prepared and implemented, including collecting and analyzing samples to characterize any contamination to determine disposal requirements.

In addition, the Site is within a Methane Hazard Zone as indicated on the mapped by the City. This map identifies areas of potentially hazardous subsurface methane gas within Los Angeles city limits. These hazardous gas zones are usually a result of naturally surfacing tar and crude oil, or shallow soil contamination by old drilling wells. As such, would be governed by the regulations per the City of Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance. This ordinance provides installation procedures, design parameters and test protocols for methane gas mitigation systems. The Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City's building code and the project specific requirements within the final geological investigation that would be submitted to the LADBS during the building permit process. Compliance with City requirements would ensure that the project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment and impacts would be less than significant.

The Project Applicant would be required by the LADBS, as part of the permitting process, to comply with the following Regulatory Compliance Measure:

RCM-HAZ-1: The Project shall include a methane mitigation system as required by the Los Angeles Building Code Chapter 71, Methane Mitigation Standards Ordinance.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR identifies measures a Lead Agency could incorporate if the Lead Agency has identified that a project has the potential for significant effects. Specifically, the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained Mitigation Measures PMM HAZ-2 and PMM HAZ-4 regarding the potential for release of hazardous materials into the environment from operation of a Project that involves use of these materials or from residual hazardous materials present as a result of historic uses. PMM HAZ-2 is not applicable as the proposed residential and retail commercial uses will not

involve the use of hazardous materials. PMM HAZ-4 identifies preparation of Phase I and II Environmental Site Assessments (ESAs) to identify the potential for residual hazardous materials from historic uses and appropriate actions to address. As discussed above, Phase I and II ESAs have been prepared and Soil Mitigation Plans have been prepared to ensure any residual contamination on the site encountered during construction is properly addressed to avoid any significant impacts. As the actions identified in PMM HAZ-4 have already been implemented result of historic uses this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project. Additionally, Mitigation Measure HAZ-MM-1 requires implementation of the Soil Mitigation Plans prepared for Sites 2 and 3.

Project-Specific Mitigation

The following mitigation measure shall be incorporated into the Project in order to reduce potential impacts to a less than significant level.

MM HAZ -1 The Soil Mitigation Plans for Site 2 dated November 2022, and for Site 3, dated September 2022, shall be implemented during construction.

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. There are no schools located within one-quarter mile of Project Site. The nearest school is Ninth Street Elementary located approximately 0.8 miles southeast of the Project Site.

As discussed above, the proposed uses would not emit hazardous emissions or handle hazardous or acutely hazardous materials.

As discussed above, a Soil Mitigation Plan will be implemented during construction and if contaminated soil is encountered during construction, this soil will be assessed to characterize the contamination and disposed of in accordance with applicable regulations. According to an Import/Export Correspondence from the Department of Transportation, the recommended haul route for loaded trucks uses the shortest distance to the nearest freeway, approximately 0.53 miles southwest of the Project Site to the Santa Monica Freeway (I-10).⁷⁶ The entry/exit routes for trucks transporting soil would avoid any nearby schools and school routes. Furthermore, the transportation of hazardous materials would be conducted in accordance with applicable State and federal laws as stated previously. During operation, no hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would be present at the Project Site. The operation of the Project would not require routine transport, use, or disposal of substantial quantities of hazardous materials. Therefore, the

⁷⁶ Edward K. Yu, Department of Transportation, *Import/Export of Earth*, September 25, 2020, **Appendix J.2.**

Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. As such, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure SMM HAZ- 3 that would apply if the Lead Agency identified significant effects on existing or proposed schools. As no significant effects on existing or proposed schools have been identified, this mitigation measures from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. Be located on a site which is included on a list of hazardous materials site compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environment conditions so as to create a significant hazardous to the public or the environment?

No Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the DTSC and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.⁷⁷

The State GeoTracker website was reviewed to determine if the site was listed as a current or former Regional Water Quality Control Board (RWQCB) or DTSC site. There are no hazardous materials sites listed on GeoTracker for the Project Site. A total of six properties within approximately 1,500 feet of the site were listed as having previously leaking underground storage tanks (USTs). All six cleanup sites have been remedied and closed as of 2017. No aboveground storage tanks (ASTs) are located on the Project Site, nor is there any indication of any underground storage tank (USTs) on the Project Site. As such, no impacts would occur.

⁷⁷ These lists include, but are not limited to, the Envirostor (<http://www.envirostor.dtsc.ca.gov/public/>) and GeoTracker (<http://geotracker.waterboards.ca.gov/>) lists maintained by the DTSC and SWRCB, respectively, accessed December 2021.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM HAZ-4 that would apply if the Lead Agency identified significant effects on the public or the environment. As discussed above, because the actions identified in PMM HAZ-4 have already been implemented this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- 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 exacerbate current environmental conditions so as to result in a safety hazard or excessive noise for people residing or working in the project area?***

No Impact. The closest public airports to the Project Site are Los Angeles International Airport (LAX) which is located approximately 10.77 miles southwest of the Project Site, the Santa Monica Airport which is located approximately 11.04 miles west of the Project Site, and the Hollywood Burbank Airport, which is located approximately 12.15 miles northwest of the Project Site. As such, the Project is not located within an airport land use plan or within two miles of a public airport or public use airport. As such, there would be no impact.

MITIGATION MEASURES

Mitigation From Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain a mitigation measure addressing safety hazards or excessive noise for projects proposed within two mile a public airport or public use airport. In addition, the Project Site is not located within two miles of a public airport or public use airport.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?***

Less than Significant Impact. The Project Site is located on the southeastern and southwestern corners of the intersection of 11th Street and S. Olive Street in the City of Los Angeles, neither of

which are a selected disaster route as identified by the City's *General Plan*.⁷⁸ 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 may result in temporary lane closures that could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation From Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure SMM HAZ-5 that would apply if the Lead Agency identified significant effects on an emergency response plan or emergency evacuation plan. As no significant effects on an emergency response plan or emergency evacuation plan, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. The Project Site is located within a highly urbanized area of the City and does not include wildlands or high fire hazard terrain or vegetation. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.⁷⁹ Additionally, the proposed automobile use would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk or loss, injury, or death as a result of exposure to wildland fires. No impacts related to this issue would occur.

⁷⁸ City of Los Angeles *General Plan*, "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

⁷⁹ City of Los Angeles' *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

MITIGATION MEASURES

Mitigation from Prior EIRs

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM WF-2 that would apply if the Lead Agency identified significant effects on people or structures. As no significant effects on people or structures have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less than Significant Impact. Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant, and for this reason, the Project would not contribute to a cumulative impact. As mentioned previously, the types and amounts of hazardous materials used during construction and operation of the mixed-use building containing residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and batteries. All potentially hazardous materials used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions, and handled in compliance with incorporated applicable federal, State, and local regulations. Related projects would also be required to comply with applicable federal, State, and local regulations including the preparation and implementation of a LADOT approved TTCP to avoid any cumulative impact on emergency access and evacuation. Therefore, development of the Project in combination with the related projects indicated in **Table 2-3** would not result in any significant cumulative hazards or hazardous materials impacts.

X. HYDROLOGY AND WATER QUALITY

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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, in a manner which would:				
i. result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<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?	<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 type="checkbox"/>	<input checked="" 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"/>

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

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

Construction Impacts

The three general sources of potential short-term, construction-related stormwater pollution associated with the Project are (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earthmoving activities, which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. Under the NPDES, the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system.

Surface water runoff from the Project Site would continue to be collected on site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention would be required as part of the Low Impact Development (LID) and SUSMP implementation features (despite no increased imperviousness of the site).⁸⁰ Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. The purpose of the LID standards is to reduce the peak discharge rate, volume, and duration of flow through the use of site design and stormwater quality control measures. As a result of compliance with the LID ordinance, the Project would not create or contribute runoff water that would exceed the capacity of existing/planned stormwater drainage systems. Finally, the Project Site is currently developed with two surface parking lots, which are entirely impervious. The Project would therefore not add further impervious surfaces. Potential water quality impacts from the Project during construction would be less than significant.

Operational Impacts

The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. City of Los Angeles Ordinance Nos. 172,176 and 173,494 specify Storm Water and Urban Runoff Pollution Control, which require the compliance and application of BMPs. The Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Full compliance with the LID Ordinance and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge

⁸⁰ City of Los Angeles, *Planning and Land Development Handbook for Low Impact Development (LID)*, https://lacitysan.org/cs/groups/sg_sw/documents/document/y250/mde3/~edisp/cnt017152.pdf. Accessed December 2021.

requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on water quality. As no significant effects on water quality have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. The Project Site is located in an urbanized area of the City. During a storm event, stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. The Project Site includes surface parking lots. The entirety of the site is paved with asphalt and concrete, with part of the asphalt being pervious. The Project Site is approximately 36,130 square feet and is approximately 68 percent impervious.⁸¹ Site 3 is approximately 46,807 square feet and is approximately 100 percent impervious.⁸² The Project is not adjacent to a well field nor part of a substantial groundwater recharge area. Surface water runoff is directed to southern, central, and eastern storm drains adjacent to Olive Street and the alley nearby.

Construction activities for the Project would include excavating down approximately 71 feet for six (6) levels of subterranean parking on Site 2 and approximately 73 feet for six (6) levels of subterranean parking on Site 3, constructing the buildings, and hardscape and landscape around the structure. Historic groundwater level in the area was found to be greater than 110 feet beneath the ground surface. Groundwater was encountered during a subsurface investigation at depths of up to 125.5 feet below ground surface.⁸³ However, the amount of groundwater infiltration likely

⁸¹ KPFF Consulting Engineers, *DTLA South Park Properties Site 2 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.1**.

⁸² KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

⁸³ Langan Engineering and Environmental Services, Inc, *Report of Geotechnical Engineering Services*, December 16, 2020., **Appendix E.1**.

to occur would be minimal given the small area and depth of the proposed excavation. As the Project's proposed excavation would not reach this depth, temporary dewatering is not expected during construction. However, if groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations.

Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources outside the Los Angeles Basin. The Project would not extract groundwater or directly use wells. The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. Additionally, operation of the Project would not interfere with any groundwater recharge activities within the area. The Project Site is currently entirely paved with a mostly impermeable surface. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on site is negligible. Under the Project, the amount of impermeable surface area would be increased comparatively. Therefore, operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge and the Project would not impede sustainable groundwater management of the West Coast groundwater basin. Impacts would be less than significant, and no mitigation measures are required.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-2 that would apply if the Lead Agency identified significant effects on scenic groundwater supplies. As no significant effects on groundwater supplies have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
- i. Result in substantial erosion or siltation on-or off-site***

Less than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the Project Site or an existing stream or river, so that substantial erosion or siltation would result on or off site.

The Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity and is almost entirely developed with impervious surfaces. After construction, the Project would introduce 100 percent impervious surfaces to the Site. Current stormwater runoff flows to the local storm drain system. Under the post-Project condition, the Project Site would be developed with additional permeable surfaces when compared to existing conditions, based on the amount of landscaping that would be provided as part of the Project.

As stated in the Hydrology and Water Resources Technical Report,⁸⁴ the Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. As discussed previously, the Site 2 Development would include excavation to a maximum depth of 71 feet below ground.⁸⁵ The Site 2 Development would also result in a net export of approximately 118,543 cubic yards of existing soil. These activities would temporarily expose the underlying soils and may make Site 2 temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. While grading and construction activities may temporarily alter the existing drainage patterns of Site 2, BMPs would be implemented to minimize soil erosion impacts during such activities. In addition, the Project Applicant would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving Site 2 after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, impacts to soil erosion or siltation would be less than significant.

As stated in the Hydrology and Water Resources Technical Report,⁸⁶ the Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. As discussed previously, the Site 3 Development would include excavation to a maximum depth of 73 feet below ground.⁸⁷ The Site 3 Development would also result in a net export of approximately 156,232 cubic yards of existing soil. These activities would temporarily expose the underlying soils and may make Site 3 temporarily more permeable. Also, exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. While grading and construction activities may temporarily alter the

⁸⁴ KPFF Consulting Engineers, *DTLA South Park Properties Site 2 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.1**.

⁸⁵ KPFF Consulting Engineers, *DTLA South Park Properties Site 2 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.1**.

⁸⁶ KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

⁸⁷ KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

existing drainage patterns of Site 3, BMPs would be implemented to minimize soil erosion impacts during such activities. In addition, the Project Applicant would be required to implement a LID (low impact development) Plan (during operation), which would reduce the amount of surface water runoff leaving Site 3 after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, impacts to soil erosion or siltation would be less than significant.

MITIGATION MEASURES

Mitigation From Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on existing zoning. As no significant effects have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- 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. No stream or river traverses the Project Site, which is relatively flat and grading on the site would not alter existing landforms or drainage patterns. The Project Site is currently entirely paved with impervious surfaces. The Project Site is not located adjacent to a stream or river. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site and the vicinity are served by existing storm drains along the surrounding streets.

The Project would be required to comply with the City's LID Ordinance and Project SUSMP. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. During operation, the Project would be required to control stormwater runoff using best management practices, including site specific measures incorporated into the final Project plans, which would be reviewed by the Bureau of Engineering (BOE) prior to issuance of grading and building permits.

In the existing condition, stormwater runoff primarily sheet flows from the parking lot over the sidewalks and into the gutters. Based on the size of Site 2, the LID system would be required to

mitigate 20,270 gallons of runoff generated by the design storm event (see **Appendix G.1: Site 2 Hydrology and Water Resources Technical Report** for calculations). Project operation would manage stormwater flow locally into drains, which would discharge through the curb face at concentrated points. By concentrating flows across the site, the peak intensity of stormwater runoff is smoothed, resulting in a reduced rate of runoff despite the overall volume remaining unchanged.⁸⁸ The LID requirements for Site 2 would outline the stormwater treatment postconstruction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. The Project BMPs implemented would control runoff without an increase relative to the existing condition. Therefore, it is highly unlikely the project would cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on Site 2.

In the existing condition, stormwater runoff primarily sheet flows from the parking lot over the sidewalks and into the gutters. Based on the size of Site 3, the LID system would be required to mitigate 26,264 gallons of runoff generated by the design storm event (see **Appendix G.2: Site 3 Hydrology and Water Resources Technical Report** for calculations). Project operation would manage stormwater flow locally into drains, which would discharge through the curb face at concentrated points. By concentrating flows across the site, the peak intensity of stormwater runoff is smoothed, resulting in a reduced rate of runoff despite the overall volume remaining unchanged.⁸⁹ The LID requirements for Site 3 would outline the stormwater treatment postconstruction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event, per the City's Stormwater Program. The Project BMPs implemented would control runoff without an increase relative to the existing condition. Therefore, it is highly unlikely the project would cause flooding during a 50-year storm event or result in a permanent adverse change to the movement of surface water on Site 3.

The City's LID Manual directs projects towards the most feasible BMPs. Specifically, LID guidelines require that infiltration systems maintain at least 10 feet of clearance to the groundwater, property line, and any building structure. Groundwater was encountered at a depth of 130 feet below ground surface with the historic high groundwater level at least 110 feet below the ground surface.⁹⁰ According to the *Geotechnical Investigation*⁹¹ prepared for Site 2, stormwater infiltration should occur least 40 feet below the foundation of the buildings and may extend to at least a depth of 115 feet below ground, which is at least 10 feet above the seasonal average groundwater level based on the data from current and prior borings conducted at the

⁸⁸ KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

⁸⁹ KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

⁹⁰ Langan Engineering and Environmental Services, Inc, *Report of Geotechnical Engineering Services*, December 16, 2020, **Appendix E.1**.

⁹¹ Langan Engineering and Environmental Services, Inc, *Report of Geotechnical Engineering Services*, December 16, 2020, **Appendix E.1**.

site. According to the Geotechnical investigation prepared for Site 3, stormwater infiltration should occur at least 40 feet below the foundation of Site 3 and at least 30 feet below the bottom of the parking garage assuming a design infiltration rate of 15 inches per hour. The Project would not substantially increase the rate or amount of surface runoff from the Project Site in a manner which would result in flooding on or off site. Therefore, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on surface runoff. As no significant effects on surface runoff have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

- iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

Construction Impacts

Construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering can contribute to pollutant loading in stormwater runoff. However, as previously discussed, the Project Applicant would prepare and implement the required SWPPP including BMPs that would include but not be limited to erosion control, sediment control, non-stormwater management, and materials management BMPs. The Project would implement an erosion control plan as part of the SWPPP, that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The erosion control plan measures are designed to contain and treat, as necessary, stormwater or construction watering on Site 2 so runoff does not impact off-site drainage facilities or receiving waters.

Construction activities are temporary and flow directions and runoff volumes during construction would be controlled. Thus, through compliance with all NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, the Project would not substantially alter Site 2 drainage patterns in a manner that would result in exceedance of the existing drainage system.

Operational Impacts

Operation of the Project also has the potential to degrade water quality and/or waste discharge requirements. The Project is expected to increase the overall percentage of impervious areas from the current condition of Site 2. Though the Project is anticipated to have landscaping on the ground level and incorporate planters in amenity spaces, it would be supported mostly by the concrete subterranean parking structure below which would prohibit stormwater from percolating into the ground. As such, the Project condition at full buildout has been analyzed as being 100% impervious.

As the proposed buildings are anticipated to encompass nearly all so Sites 2 and 3, it is anticipated that the entirety of building and site drainage may collect to a single point (typically a BMP system) and excess water would be routed to a single discharge point.

The Project would not increase the rate or volume of stormwater runoff.⁹² In other words, the Project would not substantially reduce or increase the amount of surface water into the existing infrastructure or any waterbody and would not substantially alter the pattern or quantity of runoff. Therefore, impacts related to stormwater infrastructure improvements would be less than significant.

As discussed above, a SUSMP would be required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. In addition to the SUSMP, LID techniques would be required for the Project. Implementation of the required SUSMP and LID techniques would ensure these impacts would be less than significant. Therefore, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on runoff water. As no significant effects on runoff have been identified, this mitigation measure

⁹² KPFF Consulting Engineers, *DTLA South Park Properties Site 3 Project, Hydrology & Water Resources Technical Report*, September 2021, **Appendix G.2**.

from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

iv. impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency’s (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X – Area of Minimal Flood Hazard, which is a designation for areas determined to be outside the 100-year flood hazard area.⁹³ As the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures are required.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on stormwater drainage systems. As no significant effects on stormwater drainage systems have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

No Impact.

Flood Hazard and Tsunami

Inundation of water, including through 100-year storm flooding and tsunami can result in the release of pollutants as floodwaters that have encountered such pollutants (such as oil and grease deposits on driving surfaces, trash, and stored chemicals required for cleaning and maintenance) recede. With respect to the potential impact from a flood hazard, the Project Site is relatively flat and is surrounded by urban development. According to the City’s General Plan Safety Element

⁹³ Federal Emergency Management Agency (FEMA), “Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1617G,” <http://msc.fema.gov/portal>, accessed December 2021.

the Project Site is not located within a designated flood zone.⁹⁴ The Project is located within designated flood area Zone X⁹⁵ as identified by the Federal Emergency Management Agency (FEMA).⁹⁶ The flood hazard risk in this zone is considered minimal. Therefore, the Project would not place housing within a 100-year flood hazard area. Impacts would be less than significant.

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. The Project Site is not located within a coastal area. According to the County of Los Angeles General Plan (1990), the site is not located within a potential inundation area for seismically induced dam/reservoir failure.⁹⁷ Furthermore, tsunamis are not considered a hazard at the site.

Seiche Zone

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A significant impact would occur if the Project Site was sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (e.g., seiche and tsunami). As the Project Site is located within an urban area and not within a coastal area, Site 2 is not located within a potential seiche zone.⁹⁸ According to the Safety Element of the City *General Plan*, the Project Site is not located within a potential inundation area.⁹⁹ Water from failure of the nearest reservoir, Silver Lake Reservoir, is not expected to flow toward the Project Site.

Mud Slide/Mud Flow

Mud slides and mud flows occur as a result of downslope movement of soil and/or rock under the influence of gravity. A significant impact would occur if Site 3 were located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site is located in an urban area, on relatively flat land and is not located near or adjacent to any hillsides. Therefore, there is no potential for an impact to occur due to mud slides or mud flow.

⁹⁴ City of Los Angeles, Department of City Planning, *General Plan*, "Safety Element" (1996), Exhibit F: 100-Year & 500-Year Flood Plains in the City of Los Angeles.

⁹⁵ Zone X: areas of 0.2 percent annual chance flood; areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1 percent annual chance flood.

⁹⁶ Federal Emergency Management Agency, "Flood Map Service Center," <http://msc.fema.gov/portal>, accessed February 2018.

⁹⁷ Langan Engineering and Environmental Services, Inc, *Report of Geotechnical Engineering Services*, December 16, 2020, **Appendix E.1**.

⁹⁸ City of Los Angeles *General Plan*, "Safety Element" (1996), Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles.

⁹⁹ City of Los Angeles *General Plan*, "Safety Element" (1996), Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles.

As such, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on pollutants. As no significant effects on pollutants have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

Less than Significant Impact. The Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe) and would be required to prepare and implement a SUSMP, in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the Project. Additionally, in accordance with NPDES requirements, a SWPP would be developed and implemented during Project construction. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation From Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM-HYD-1 that would apply if the Lead Agency identified significant effects on a water quality control plan or sustainable groundwater management plan. As no significant effects on a water quality control plan or sustainable groundwater management plan have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. The Project Site as well as the related projects listed in **Table 2-3**, are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

<i>Would the project:</i>	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"/>

a. Physically divide an established community?

No Impact. A significant impact could occur if a project is large enough or otherwise configured in such a way as to create a physical barrier within an established community. The Project does not include any operational or structural changes that would bisect surrounding land uses, nor obstruct any roads or linkages between existing uses. As such, no impact would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM LU-1 that would apply if the Lead Agency identified significant effects. As no significant effects have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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. A significant impact could occur if a project is inconsistent or in conflict with planning or zoning designations currently applicable to the Project Site. The Project Site is located within the jurisdiction of the City and is subject to several local and regional land use plans, as discussed below.

SCAG Connect SoCal 2020–2045 RTP/SCS

The Project Site is located within the six-county region that comprises the Southern California Association of Governments (SCAG) planning area. SCAG prepared the 2008 Regional

Comprehensive Plan (2008 RCP) in response to SCAG Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, security, and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the *Connect SoCal 2020–2045 RTP/SCS*. As the *Connect SoCal 2020–2045 RTP/SCS* encompasses and builds upon the previous 2016–2040 RTP/SCS, many of the goals and strategies from the previous plan are incorporated and have been updated or expanded upon. The *Connect SoCal 2020–2045 RTP/SCS* aims to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve, and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation.

Based on the analysis presented in *Table 4.11-1: Consistency Analysis Connect SoCal 2020–2045 RTP/SCS* (see **Appendix H: Land Use Plan Policy Consistency Tables**), the Project would not be in conflict and would be consistent with applicable *Connect SoCal 2020–2045 RTP/SCS* goals. The Project would be well-served by mass transit, including multiple nearby bus lines provided by Metro and is located in both a TPA and HQT. The Project would include bicycle parking facilities adjacent to the entrance on Margo Street. The Project would create a pedestrian-friendly environment by providing a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons and a pedestrian plaza space at the corner of the 11th Street and Olive Street frontages adjacent to the Project's commercial uses. The Project would provide Metro mass transit riders access to the existing Metro light-rail station, extensive bus network that services the Site, and the proposed Los Angeles Streetcar, planned to service 11th Street in South Park. In addition to these mass transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of an infill mixed-use transit-

oriented development Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities in the area.

As shown in *Table 4.11-1* (see **Appendix H**), the Project would not be in conflict and would be consistent with the 2020–2045 goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation.

The Project would be consistent with policies set forth in the *Connect SoCal 2020–2045 RTP/SCS* because it would redevelop an underdeveloped site within an existing urban setting. The Project would include 1,249 residential units and ground floor commercial uses and would be located in an urban area well-served by mass transit provided by Metro. Furthermore, the Project would place residents, employees, and visitors in proximity to corridors well-served by mass transit. The integration of land uses on the Project Site would produce multimodal travel options to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions and would therefore not conflict with the goals of the *Connect SoCal 2020–2045 RTP/SCS*. Therefore, the Project would result in a less than significant impact as it would not conflict with the *Connect SoCal 2020–2045 RTP/SCS*.

Land Use Tools

The SCAG *Connect SoCal 2020–2045 RTP/SCS* outlines various land use tools to assist agencies in implementing sustainable community strategies.

Center Focused Placemaking

The goal of center focused placemaking is to create connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG emissions. Center focused placemaking is prioritized in urban and suburban infill sites in the SCAG region. As discussed above, the Project is an infill development within a HQTAs and a TPA and is within a major employment center. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and high-performance building envelopment. Additionally, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. As such, the Project would be consistent with the principle of center focused placemaking.

Priority Growth Areas

Currently only four percent of the SCAG region's total land area account for Priority Growth Areas (PGAs); however, implementation of SCAG's recommended growth strategies will help increase both household growth and employment growth in these areas. Focusing growth in PGAs will reduce travel distances, increase mobility options, and improve access to workplaces as a compact form of regional development. As discussed above, the Project is an infill development within a HQTAs and a TPA and is within a major employment center. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Project would provide a variety of dwelling units sizes including studio units, one-bedroom units, two-bedroom units, and three-bedroom units. As such, the Project would be consistent with the strategy of Priority Growth Areas.

Job Centers

Job Centers are areas with denser employment than their surroundings, representing areas with local employment peaks rather than places with the most jobs. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced. As discussed above, the Project Site is located in a HQTAs and a TPA as defined by CEQA. Additionally, the Project would develop new residential and commercial uses within walking distance of numerous employment opportunities. Additionally, the Project Site is located within 0.25 of a Metro Pico light-rail station, and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would reduce VMT and promote alternatives to driving. As such, the Project would be consistent with the growth concentrated in Job Centers across the SCAG region.

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. As discussed above, the Project Site is located within 0.25 miles of the Metro Pico light-rail station and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would reduce VMT and promote alternatives to driving. As such, the Project's location in a TPA would be consistent with SCAG's strategy to focus infill development in established communities with access to high-quality transportation.

High Quality Transit Areas

HQTAs are corridor-focused Priority Growth Areas within one-half 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. As discussed above, the Project Site is located in a HQTA and a TPA as defined by CEQA. Additionally, the Project would develop new residential and commercial uses within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located within 0.25 miles of the Metro Pico light-rail station and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would reduce VMT, promote alternatives to driving, and aim to improve air quality. The Project would also provide approximately 524 bicycle parking spaces. As such, the Project would be consistent with SCAG's HQTA strategy.

Neighborhood Mobility Areas

Neighborhood mobility areas (NMAs) focus on creating, improving, restoring, and enhancing safe and convenient connections to surrounding community land uses. NMAs are Priority Growth Areas with residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. As discussed above, the Project Site's location near mass transit, walking distance to services, retail stores, employment opportunities, and the availability of bike parking located on the Project Site would promote a variety of transportation options, allowing residents to connect to surrounding destinations. As such, the Project would be consistent with the strategy of Neighborhood Mobility Areas by creating more walkability within the Project Site and surrounding area.

Livable Corridors

The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors, and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers. The Livable Corridors strategy aims to encourage density through transit improvements, active transportation improvements, and land use policies such as mixed-use zoning. As discussed above, the Project's mixed-use design and location encourages the use of alternative transportation, including walking and bicycling opportunities. The Project Site is located within 0.25 of the Metro Pico light-rail station and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is located in the South Park area of the City surrounded by residential, retail, and office uses. As such, the Project would be consistent with the strategy of Livable Corridors.

Spheres of Influence

A Sphere of Influence (SOI) is a planning boundary outside of a local agency's legal boundary, such as the city limit line, which designates the agency's future boundary and service area. The intent of an SOI is to promote the efficient, effective, and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies. SOI discourages urban sprawl and promotes growth in an efficient manner that limits sprawl and leapfrog development.

This strategy is directed toward SCAG and the City. Nonetheless, the Project is an infill mixed-use development that would add 1,249 new housing units and employment as well as increase the utilization of the Project Site, which is currently used as a surface parking lot on both Site 2 and Site 3. As such, the Project would be consistent in developing a mixed-use building that fits within SCAG's Spheres of Influence strategy.

City of Los Angeles General Plan

The Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Uses Element is comprised of 35 community plans.

The elements that would be most applicable to the Project are the Framework Element, Housing Element, and the Mobility Plan. The consistency of the Project with applicable objectives and policies in the General Plan is presented in *Table 4.11-2: City of Los Angeles General Plan – Consistency with Applicable Policies* contained in **Appendix H**.

Framework Element

The Project Site is subject to the applicable plans and policies of the City of Los Angeles General Plan. The land use component of the City of Los Angeles General Plan is set forth in the Framework Element and in Community Plans. The Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts.

The Project Site is within the Downtown Center depicted on the Long Range Land Use Diagram within the Framework Element. The Downtown Center is described as including a range of uses and generally characterized by high rise buildings with a floor area ratio up to 13:1. The stated Land Use Objective for the Downtown Center is to “Provide for the continuation and expansion of government, business, cultural, entertainment, visitor-serving, housing, industries, transportation, supporting uses, and similar functions at a scale and intensity that distinguishes and uniquely identifies the Downtown Center.” The Project would expand the housing opportunities with the Downtown Center. The Project would also place new multifamily housing in proximity to transit, thereby furthering the objectives of the Framework Element. Based on the analysis presented in *Table 4.11-2* (see **Appendix H**), the Project would be consistent with the applicable objectives and policies in the Framework Element. The Project would be consistent with the policy and objectives of the Land Use Chapter by support the needs of the City’s existing and future residents, businesses, and visitors by providing residential units and commercial uses, including general commercial, restaurant, and retail uses. In addition, development of the Project in an area with convenient access to mass transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution while supporting the City’s objective to encourage commercial uses along primary transit corridors/boulevards and in designated Community Centers areas.

The Project would be consistent with the policy and objective of the Housing Chapter by providing a range of new housing units near existing mass transit. The scale and character of the Project is consistent with the surrounding urbanized area. The Project would be consistent with the goal, objectives and policies of the Urban Form and Neighborhood Design Chapter by providing new residential, commercial uses, and open space available to the public and streetscape improvements that would enhance pedestrian activity.

The Project would be consistent with the Open Space and Conservation Chapter by providing a minimum of approximately 58,275 square feet of on-site open space on Site 2 and 75,425 square feet of on-site open space on Site 3 for a total of 133,700 square feet of on-site open space for the Project. The Project’s various amenities would include a swimming pool and outdoor amenity deck, fitness center, coworking facilities, multipurpose rooms, lounge areas, and a dog lounge and outdoor dog run. Open space for the proposed residential uses would include private balconies and outdoor residential common spaces on higher floors.

The Project would be consistent with the Economic Development Chapter by bringing new economic investment to an area well served by existing mass transit. Furthermore, the Project would contribute to the establishment of a 24-hour community that would benefit existing businesses in the area.

The Project would be consistent with the Transportation Chapter by supporting an area targeted for high-density and a focal point of region commerce identity and activity through the provision

of additional housing and commercial uses and employment opportunities for the Project area. The Project would augment the streetscape with a publicly accessible plaza area to enhance and beautify the streetscape while providing shading and circulation enhancement for pedestrians.

The Project would be consistent with the Infrastructure and Public Services Chapter by reducing the amount of hazardous substances and the total amount of flow entering the wastewater system through implementation of Stormwater Pollution Prevent Plan (SWPPP) and Best Management Practices (BMPs). The Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and its water demands would be met by the LADWP.

Therefore, the Project would result in a less than significant impact as it would not conflict with the General Plan Framework Element.

Housing Element

Based on the analysis presented in *Table 4.11-2* (see **Appendix H**), the Project would be consistent with the applicable objectives and policies in the Housing Element. The Project would provide 1,249 new residential units that would add to the citywide housing supply. The Project would be a mixed-use development that would include new jobs associated with retail and restaurant uses that are accessible to the Metro A and E Lines via the Metro Pico station and bus stops along the perimeter. In addition, The Project would promote and facilitate reduction of water consumption through the use of water saving and energy saving devices such as low-flow toilets. Finally, the Project would be an infill, urban-scale transit oriented development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the Central City Community Plan. Therefore, the Project would result in a less than significant impact as it would not conflict with the Los Angeles General Plan Housing Element.

Mobility Plan

Based on the analysis presented in *Table 4.11-2* (see **Appendix H**), the Project would be consistent with the applicable objectives and policies in the Mobility Plan. Specifically, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing a Construction Traffic Management Plan that would identify the location of any temporary lane and sidewalk closures and provide for measures to maintain both directions of travel. Also, by contributing a wider range of land uses and providing much needed housing to an area adequately served by mass transit, most errands could be accomplished without the need of a single-passenger vehicle, thus reducing VMT. The Project Site is within 0.25 miles of the Metro Pico Station and provides bus stops along the perimeter, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles. In addition, the Project would provide chargers and parking spaces for

electric vehicles on the Project Site, thereby further reducing consumption of petroleum-based fuels. The Project would provide enhancements to ensure a quality pedestrian environment along 11th Street and Olive Street with street trees and drought-tolerant landscaping. In addition, the Project would contribute to the City's policy to provide safe and convenient bicycle facilities by providing on-site bicycle parking spaces. Additionally, given the location of the Project Site in close proximity to mass transit, the Project would provide residents, visitors, patrons, and employees convenient access to mass transit services. Therefore, the Project would not conflict with the applicable policies that support the goals and objectives set forth in the Mobility Plan and impacts would be less than significant.

Applicable Community Plans

Downtown Community Plan (2040) and Central City Community Plan

The Los Angeles City Planning Department is currently in the process of updating the Downtown Community Plan. The upcoming steps to complete the adoption of the Downtown Community Plan include receiving the recommendations for approval from the City Council's Planning and Land Use Management (PLUM) Committee, and then the final approval from the full City Council. The updated Downtown Community Plan consists of a sustainable, equitable, and inclusive focus for the future of the downtown community. Based on the analysis presented in *Table 4.11-3: Downtown Community Plan Consistency* and *Table 4.11-4: Central City Community Plan Consistency* (see **Appendix H**), the Project would be consistent with the applicable objectives and policies in the Draft Downtown Community Plan and the Central City Community Plan.

The Project Site is located in South Park, an urbanized district of the Central City Plan area. Both the Downtown and Central City Community Plans' goals and policies address residential, commercial, and industrial development and identify implementation strategies and programs relative to commercial revitalization, health, and sustainability as well as historic preservation and the conservation of neighborhood character. The Central City Community Plan designates much of South Park as high-density residential land use.

The Project would provide a mix of uses in Downtown Los Angeles along 11th Street and Olive Street and would promote pedestrian activity while providing housing units in close proximity to mass transit. The Project would provide retail and restaurant uses to serve the existing community, regenerate neighborhood character, and establish connectivity to nearby high-density residential areas. The scale of the Project would not conflict with existing neighborhood character and identity by including high-rise residential units near existing multifamily residential uses. As such, the Project would not conflict with the applicable policies in the Downtown Community Plan and the Central City Community Plan and impacts would be less than significant.

Zoning Regulations, Los Angeles Municipal Code

The Project Site is zoned C2-4D-O (Regional Center Commercial), which permits a range of commercial and residential uses by right and limits the FAR to 13:1 without restriction to building height. The Project would contain residential and commercial uses permitted uses within the C2-4D-O zone for both Site 2 and Site 3. The Project would consist of an FAR of 9.13:1 for Site 2 and an FAR of 9.00:1 for Site 3 as permitted with approval of a Transfer of Development Rights (TFAR) application. Furthermore, the Project Site would require a 15 foot by 15 foot cut corner and a two-foot dedication along 11th Street for sidewalk widening to create the right of way width specified in the City's Mobility Element. As shown in **Tables 2-1** and **2-2**, Site 2 would include 536 residential units, 491,515 square feet of floor area, 603 feet in height, and 51 floors; Site 3 would include 713 residential units, 608,977 square feet of floor area, 678 feet in height, and 60 floors.

As such, the Project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project is consistent with the General Plan land use designation and zoning for the Project Site, and the Project would not conflict with any applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Project impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM LU-2 that would apply if the Lead Agency identified significant effects. As no significant effects have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Development of the Project in conjunction with the related projects in **Table 2-3** would result in an intensification of land uses in Downtown Los Angeles. Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. The Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives related to reducing urban sprawl, efficiently utilizing existing infrastructure,

reducing regional congestion, and improving air quality through the reduction of VMT, while helping the City meet its housing needs. This is consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the number of retail and commercial uses. Further, all related projects in the City would be subject to the same local development standards as the Project. Therefore, cumulative impacts related to land use and planning would be less than significant.

XII. MINERAL RESOURCES

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. A significant impact could occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if a project would convert an existing or future regionally-important mineral extraction use to another use, or if a project would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a designated MRZ-2 Area,¹⁰⁰ but it is located in both an Oil Drilling District and a State-designated oil field¹⁰¹ as it is within the boundaries of the LA Downtown Oil Field. There are no historic or abandoned oil or gas wells located on the Project Site.¹⁰² The closest oil well is the Chevron USA Inc. “Broadway Corehole” 1, an abandoned well located approximately 800 feet southwest of the Project Site and is currently abandoned. Based on the distance and status of this well, there is a low potential for this well to impact the Project. A Phase II Site Assessment was conducted for the proposed Site 2 Development and also found no impacts from nearby oil and gas wells.¹⁰³ As such, no impacts would occur to existing oil or gas resources.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM MIN-1 that would apply if the Lead Agency identified significant effects on the loss of a mineral resource. As no significant effects on the loss of a mineral resource have

¹⁰⁰ City of Los Angeles *General Plan*, “Conservation Element” (2001), Exhibit A: Mineral Resources.

¹⁰¹ City of Los Angeles *General Plan*, “Safety Element” (1990).

¹⁰² BA Environmental, *Phase I Site Assessment for Site 2*, June 5, 2013, **Appendix F.1**.

¹⁰³ BA Environmental, *Limited Phase II Subsurface Investigation for Site 2*, February 12, 2018, **Appendix F.3**.

been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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

No Impact. Although located in both an Oil Drilling District and a State-designated oil field in the City of Los Angeles General Plan, the Project Site is fully developed with existing surface parking lots which has precluded its use for mineral extraction. The Project Site is also not located within an MRZ-2 Area as previously stated. Additionally, there are no historic or abandoned oil or gas wells located on the site.^{104,105} Therefore, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure SMM MIN-1 PMM MIN-1 that would apply if the Lead Agency identified significant effects on availability of mineral resource. As no significant effects on availability of mineral resource have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

No Impact. As discussed above, the Project would have no impact on mineral resources. It is not known if any of the five related projects, indicated in **Table 2-2**, would result in the loss of availability of known mineral resources. Nevertheless, the Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have a less than significant cumulative impact on mineral resources.

¹⁰⁴ BA Environmental, *Phase I Site Assessment for Site 2*, June 5, 2013, **Appendix F.1**.

¹⁰⁵ BA Environmental, *Phase I Site Assessment for Site 3*, June 5, 2013, **Appendix F.2**.

XIII. NOISE

<i>Would the project result in:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

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

Less than Significant with Mitigation Incorporated. The City has adopted local guidelines based in part on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. CNEL guidelines for specific land uses are classified into four categories: (1) normally acceptable; (2) conditionally acceptable; (3) normally unacceptable; and (4) clearly unacceptable.

The City defines the following significance thresholds for construction activities lasting more than 10 days in a 3-month period or occurring during the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday:

- On-site Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, as measured at the property line of any sensitive use.
- Off-site Project construction traffic causes the exterior ambient noise level to increase by 5 dBA CNEL or more at a noise-sensitive use, as measured at the property line of any sensitive use.

Operational noise impacts are evaluated for Project-related off-site roadway traffic noise impacts and on-site stationary source noise from on-site activities and equipment.

- The Project would cause any ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “conditionally acceptable”; or cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either “normally acceptable” or “clearly unacceptable.”
- Project-related operational (i.e., non-roadway) noise sources such as outdoor activities, building mechanical/electrical equipment, etc., increase ambient noise level by 5 dBA, causing a violation of the City Noise Ordinance.

The LAMC indicates that in cases where the actual ambient conditions are not known, the City’s presumed daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) minimum ambient noise levels as defined in Section 111.02 of the LAMC should be used. The presumed ambient noise levels for these areas set forth in the LAMC Sections 111.02 and 112.05 are provided in **Table 6-16: City of Los Angeles Presumed Ambient Noise Levels.**

Section 41.40 of the LAMC regulates noise from demolition and construction activities. More specifically, Section 41.40 prohibits construction activity and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence between the hours of 9:00 PM to 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. All such activities are prohibited on Sundays and all federal holidays.

**TABLE 6-16
CITY OF LOS ANGELES PRESUMED AMBIENT NOISE LEVELS**

Zone	Daytime Hours (7:00 AM to 10:00 PM) dBA (Leq)	Nighttime Hours (10:00 PM to 7:00 AM) dBA (Leq)
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Source: Los Angeles Municipal Code, sec. 111.03.

Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the City or within 500 feet thereof. Specifically, any construction machinery may not generate a maximum noise level exceeding 75 dBA at 50 feet from the equipment. However, the above noise limitation does not apply where compliance

is technically infeasible. LAMC Section 112.05 defines technical infeasibility to mean that “said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.”

Short-term sound monitoring was conducted at three (3) locations to measure the existing ambient sound environment in the Project vicinity, as shown in **Figure 6-2: Noise Measurement Locations**. Measurements were taken over 15-minute intervals at each location between the hours of 2:02 PM and 2:52 PM on January 1, 2020, as indicated in **Table 6-17: Existing Ambient Noise Measurements**. As shown in **Table 6-17**, ambient noise levels ranged from a low of 61.4 dBA north of Site 3 along W. 11th Street to a high of 68.9 dBA west of Site 3 along S. Olive Street.

TABLE 6-17
EXISTING AMBIENT NOISE MEASUREMENTS

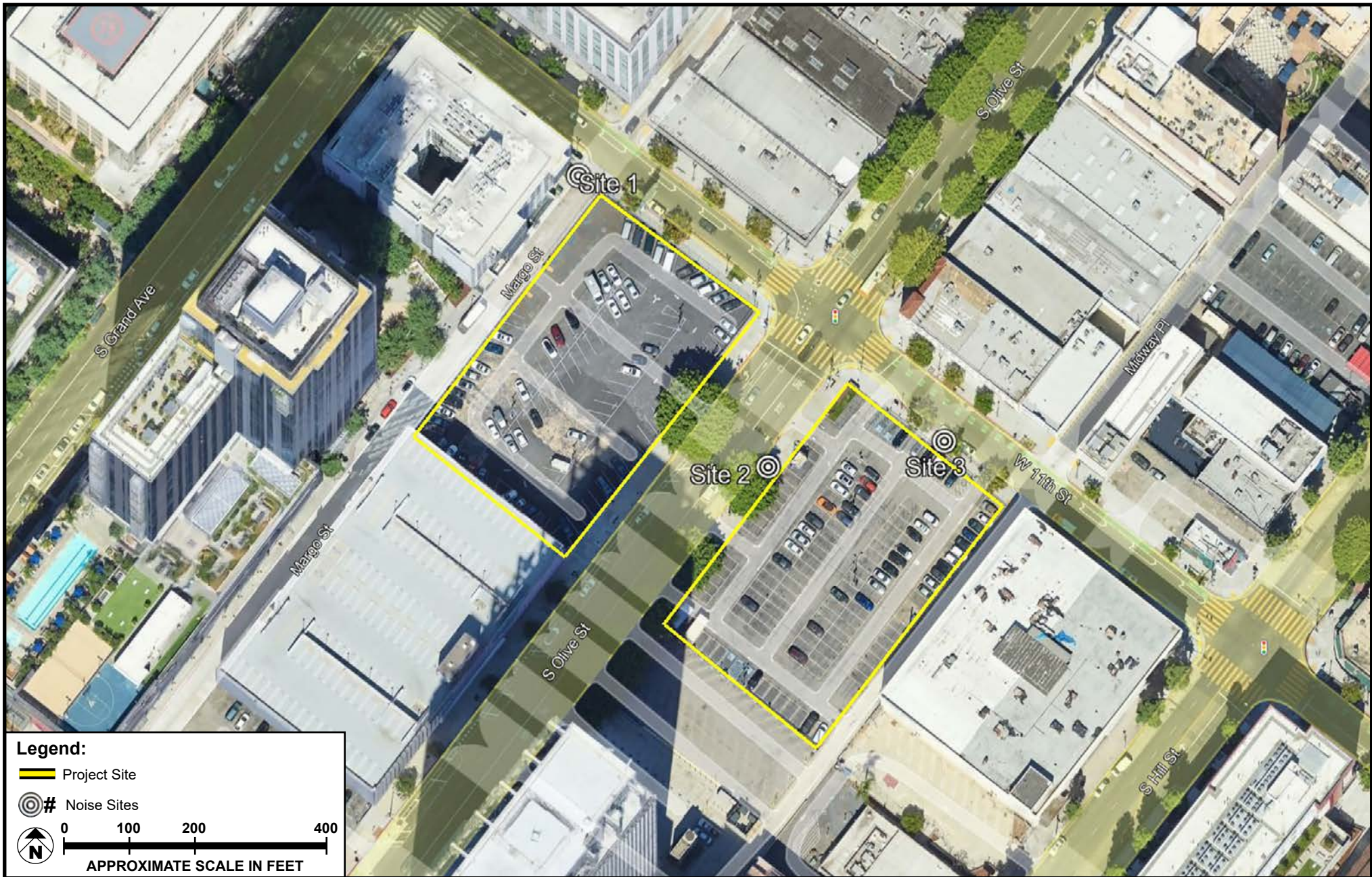
Location Number/Description	Nearest Use	Time Period	Noise Source	dBA Leq
1 North of Site 2 along W. 11th Street	Residential	2:02 PM– 2:17 PM	Pedestrian and traffic along W. 11th Street	63.3
2 West of Site 3/East of Site 2 along S. Olive Street	Commercial	2:18 PM– 2:33 PM	Pedestrian and traffic along S. Olive Street	68.9
3 North of Site 3 along W. 11th Street	Commercial	2:37 PM– 2:52 PM	Pedestrian and traffic along W. 11th Street	61.4

*Source: Refer to **Appendix I.2** for noise monitoring data sheets.*

Notes: dBA = A-weighted decibels; Leq = average equivalent sound level.

Construction

Construction activities that would occur during the construction phases (demolition, grading, building construction, paving, and architectural coatings) would generate both steady-state and episodic noise that would be heard both on and off the Project Site. As shown previously in **Table 6-6**, construction on Sites 2 and 3 would result in concurrent construction activities. Specifically, construction of the building on Site 2 would occur concurrently with demolition and grading on Site 3. Moreover, the Site 2 paving phase would occur concurrently with the Site 3 grading and building construction phases. It is important to note that the Site 2 Development would be operational before completion of the Site 3 Development. Specifically, the Site 2 Development would be operational during the Site 3 building construction, paving, and architectural coating phases. These overlaps are considered in the analysis below to determine worst-case construction noise levels.



SOURCE: Google Earth - 2023

FIGURE 6-2

Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on each site would operate simultaneously. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required. As would be the case for construction of most land use development projects, construction of the proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level.

As discussed above and shown in **Figure 6-1**, the nearest sensitive receptors to Site 2 include residential uses approximately 25 feet to the west across Margo Street at 1120 S. Grand Avenue, an apartment building. The nearest sensitive receptors to Site 3 include residential uses approximately 240 feet to the east at 1100 S. Hill Street, an apartment building. However, it should be noted that the residential uses associated with Site 2 would be operational prior to completion of Site 3. These uses would be located approximately 90 feet from Site 3. The noise levels at the nearest sensitive receptors to each site from construction activity are shown in **Table 6-18: Construction Maximum Noise Estimates**.

**TABLE 6-18
CONSTRUCTION MAXIMUM NOISE ESTIMATES**

Nearest Sensitive Receptor ^a	Construction Phase	Max Construction Leq	Existing Ambient Noise Leq (dBA)	Significance Threshold (5 dBA over Ambient)	Maximum Noise Increase over Significance Threshold without Regulatory Compliance Measures (dBA)
Multi-family residential uses to the west along Margo Street	Site 2 Demolition	91.6	63.3	68.3	+28.3
Multi-family residential uses to the east along S. Hill Street	Site 2 Building Construction / Site 3 Grading	72.3	61.4	66.4	+5.9
Multi-family residential uses on Site 2	Site 3 Building Construction	79.0	63.3	68.3	+10.7

Source: FHWA, RCNM, version. 1.1.

Refer to **Appendix I.3** for Construction Noise Worksheets.

^a More detailed construction noise level tables provided in **Appendix I.1**.

As shown, estimated construction noise levels, without considering any reduction measures associated with code compliance, at the residential uses along Margo Street would result in a maximum increase of 28.3 dBA above the significance threshold during the Site 2 demolition phase. Construction noise levels at the residential uses along Hill Street would result in a maximum increase of 28.3 dBA above the significance threshold during the concurrent Site 2 building construction phase and Site 3 grading phase. Construction noise levels at the proposed Site 2 Development residential uses would result in a maximum increase of 25.1 dBA above the significance threshold during the Site 3 building construction phase. These noise levels do not take into consideration any noise reduction measures associated with regulatory or code compliance.

Construction equipment operates at its noisiest levels for certain percentages of time during operation. Equipment such as excavators, graders, and loaders would operate at different percentages over the course of an hour.¹⁰⁶ During a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which a reasonable number of construction equipment was assumed to be operating simultaneously, given the physical size of the site and logistical limitations, and with the noise equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. This is considered a worst-case evaluation because the Project would typically use less overall equipment simultaneously at any given time and, as such, would likely generate lower noise levels than reported herein.

Pursuant to Section 41.40 of the LAMC, construction would be limited to the hours between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturday. No construction activities would occur on Sundays or federal holidays. All construction related noise would be required to comply with the provisions of Section 112.05 of the LAMC. Pursuant to Section 112.05, the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the source of the noise between the hours of 7:00 AM to 9:00 PM when the source is located within 500 feet of a residential zone. Compliance with Section 112.05 of the LAMC includes the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques. Other noise reduction techniques include **Mitigation Measure MM-NOISE-1** which specifies that all construction equipment, fixed or mobile, would be equipped with properly operating and maintained mufflers and other state-required noise attenuation devices; identify the maximum distance between construction equipment staging areas and occupied residential areas; and require the use of electric air compressors and similar power tools. Optimal muffler systems for all equipment and the break in line of sight to a sensitive receptor would reduce construction noise levels by

¹⁰⁶ Federal Highway Administration (FHWA), *Traffic Noise Model* (2006).

approximately 10 dB or more.¹⁰⁷ Limiting the number of noise-generating heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously used on the Project Site within 25 feet of off-site noise sensitive receptors surrounding the site to no more than one or two pieces of heavy-duty off-road equipment would further reduce construction noise levels by approximately 14 dBA. Also, limiting the amount of noise-generating heavy-duty construction equipment to two (2) pieces operating simultaneously would reduce construction noise levels by approximately 5 dB. Temporary abatement techniques include the use of temporary and/or movable shielding for both specific and nonspecific operations. An example of such a barrier utilizes noise curtains in conjunction with trailers to create an easily movable, temporary noise barrier system. A noise barrier can achieve a 5 dB noise level reduction when it is tall enough to break the line-of-sight to the receiver. After it breaks the line-of-sight, it can achieve approximately 1.5 dB of additional noise level reduction for each one (1) meter (3.3 feet) of barrier height.¹⁰⁸ Therefore, an approximately 15-foot-tall construction noise barrier would reduce construction noise levels by a minimum 7 dB. Compliance with Section 112.05, construction noise levels would be reduced by a minimum of 34 dB, dependent on the construction activity and height of the temporary noise barrier used. The mitigated noise levels at the nearest sensitive receptors to each site from construction activity are shown in **Table 6-19: Mitigated Construction Maximum Noise Estimates**. As shown, the mitigated construction noise levels would be below the significance thresholds. As such, with implementation of **MM-NOISE-1**, construction impacts would be less than significant.

**TABLE 6-19
MITIGATED CONSTRUCTION MAXIMUM NOISE ESTIMATES**

Nearest Sensitive Receptor	Construction Phase	Mitigated Max Construction Leq	Existing Ambient Noise Leq (dBA)	Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold with Regulatory Compliance Measures (dBA)
Multi-family residential uses to the west along Margo Street	Site 2 Demolition	57.6	63.3	68.3	0.0
Multi-family residential uses to the east along S. Hill Street	Site 2 Building Construction/ Site 3 Grading	38.3	61.4	66.4	0.0

¹⁰⁷ FHWA, *Special Report—Measurement, Prediction, and Mitigation*, updated June 2017, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm, December 2021

¹⁰⁸ FHWA, *Special Report – Measurement, Prediction, and Mitigation*, updated June 2017, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm, accessed December 2021.

Nearest Sensitive Receptor	Construction Phase	Mitigated Max Construction Leq	Existing Ambient Noise Leq (dBA)	Significance Threshold (dBA)	Maximum Noise Increase over Significance Threshold with Regulatory Compliance Measures (dBA)
Multi-family residential uses on Site 2	Site 3 Building Construction	45.0	63.3	68.3	0.0

Source: FHWA, RCNM, version. 1.1.
 Refer to **Appendix I.3** for Construction Noise Worksheets.

Off-Site Construction Noise

Construction of the Project would require worker, haul, and vendor truck trips to travel to and from the sites to export demolition debris and soil and deliver supplies. Trucks traveling to and from the sites would be required to travel along a haul route approved by the City. As discussed in the Project’s *Transportation Assessment (Appendix J.1)* the Site 2 and Site 3 grading phases would require approximately 24 haul truck trips per hour, and a total of 36 worker trips per day for each site. Haul trucks would travel on approved truck routes designated within the City. Given the Project Site proximity to State Route (SR)-110 and Interstate (I)-10, haul truck traffic would take the most direct route to the appropriate freeway ramps. Inbound trucks would exit I-10 and travel north along Olive Street until they reach the Project Site. Outbound trucks would travel north along Olive Street to W. 11th Street, where they would travel west until Grand Avenue, then they would travel south along Grand Avenue until they reach I-10.

Project haul truck trips which include medium- and heavy-duty trucks would generate noise levels of approximately 47.2 dBA and 56.7 dBA, respectively, measured at a distance of 25 feet from the nearest sensitive receptors. As shown in **Table 6-17**, existing ambient noise levels ranged from 61.4 dBA to 68.9 dBA. The noise level increases from truck trips would be below the significance threshold of 5 dBA. Accordingly, off-site construction noise impacts would be less than significant.

Operation

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. If a project would result in traffic that is less than double the existing traffic, then the project’s mobile noise impacts are assumed to be less than significant. As detailed in the Project’s *Transportation Assessment (Appendix J.1)*, the highest project-related trip increase would occur at study intersection number 4 (Olive Street/12th Street) during the PM peak hour with 114 peak hour trips. Compared to the existing PM peak hour at intersection 4 of 1,418 trips, the Project would not have the potential to double the traffic volumes on any roadway segment in the vicinity of the Project Site.

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate noise-control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls, to comply with noise-limitation requirements provided in LAMC Section 112.02, which prohibits the noise from such equipment from causing an increase in the ambient noise level of more than 5 dB. Therefore, operation of mechanical equipment on the Project building would not exceed the City's threshold of significance.

Noise would be generated by activities within the proposed parking garages. Sources of noise would include engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. It is anticipated that parking related noise would be less than existing surface parking noise as the parking for the Project would be subterranean and enclosed. In addition, parking-related noise generated by motor vehicles is regulated under the LAMC. Specifically, with regard to motor-driven vehicles, LAMC Section 114.02 prohibits the operation of any motor-driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels.

Additionally, on-site residences would not be adversely impacted by elevated ambient urban noise levels because the Project would be constructed to meet and exceed Title 24 insulation standards of the California Code of Regulations for residential buildings, which serves to provide an acceptable interior noise environment for sensitive uses. Specifically, as required by Title 24, the Project would be designed and constructed to ensure interior noise levels would be at or below a CNEL of 45 dBA in any habitable room of the Project. Given the existing measured ambient noise levels are between 61.4 dBA and 68.9 dBA, and the approximate 30 dBA exterior-to-interior noise reduction for new residential construction,¹⁰⁹ it is clear that standard construction methods and materials would achieve interior noise levels at or below 45 dBA. As such, impacts associated with interior noise levels at the proposed residences would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure MM-NOISE-1(b) that identifies measures a Lead Agency could incorporate if the Lead Agency has identified that a project has the potential for significant effects.

¹⁰⁹ Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings requires substantial building insulation and windows which reduces exterior to interior noise transmission.

The mitigation measure identified below incorporates the applicable concepts identified in SCAG mitigation measure MM-NOISE-1(b) and will be equally effective. For this reason, this mitigation measure is not incorporated into the Project.

Project-Specific Mitigation

The following mitigation measure would reduce potential impacts to a less than significant level.

MM-NOISE-1 Construction Noise

- The Project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment. The contractor(s) shall limit unnecessary idling of equipment on or near the site. The contractor(s) shall place noisy construction equipment as far from the Project Site edges as practicable. The Project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. For example, absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.
- Install temporary noise barrier that can achieve approximately 1.5 dB of additional noise level reduction for each one (1) meter (3.3 feet) of barrier height.
- Limit the number of noise-generating heavy-duty construction equipment (e.g., dozers, rollers, tractors, etc.) within 50 feet of the nearest sensitive receptor to two (2) pieces operating simultaneously.
- Install temporary noise barriers during construction.
- Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance
- Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools.
- Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.

b. Would the project result in the generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant Impact. The City has not adopted a significance threshold to assess vibration impacts during construction. However, the FTA has published a technical manual, *Transit Noise and Vibration Impacts Assessment*, which provides ground-borne vibration impact criteria

with respect to building damage during construction activities.¹¹⁰ According to the FTA guidelines, a vibration criterion of 0.20 PPV should be considered as the significant impact level for nonengineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.50 PPV based on the FTA guidelines. Structures amplify ground-borne vibration, and wood-frame buildings, such as typical residential structures, are more affected by ground vibration than are heavier buildings. The level at which ground-borne vibration is strong enough to cause architectural damage has not been determined conclusively. Based on the surrounding land use types, this analysis utilizes the 0.50 PPV threshold for nearby receptors.

As discussed previously, the nearest sensitive receptors to Site 2 include residential uses approximately 25 feet to the west across Margo Street. The nearest sensitive receptors to Site 3 include residential uses approximately 240 feet to the east along S. Hill Street. However, it should be noted that the residential uses associated with the Site 2 Development would be operational prior to completion of the Site 3 Development. These uses would be located approximately 90 feet from Site 3. **Table 6-20: Construction Vibration Levels Estimates – Building Damage** present construction vibration impacts associated with on-site construction in terms of building damage at the nearest sensitive receptors. As shown in **Table 6-20**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold at any of the nearby sensitive receptors. As such, construction vibration impacts would be less than significant.

**TABLE 6-20
CONSTRUCTION VIBRATION LEVELS ESTIMATES – BUILDING DAMAGE**

Nearest Off-Site Building Structures	Distance (feet)	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Construction Equipment						Significance Threshold (PPV ips)
		Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer	
Multi-family residential uses to the west along Margo Street	25	0.210	0.089	0.089	0.076	0.035	0.003	0.5
Multi-family residential uses to the east along S. Hill Street	240	0.007	0.003	0.003	0.003	0.001	0.000	0.5

¹¹⁰ Federal Transit Authority (FTA), *Transit Noise and Vibration Impact Assessment*, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed December 2021.

Nearest Off-Site Building Structures	Distance (feet)	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Construction Equipment						Significance Threshold (PPV ips)
		Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer	
Multi-family residential uses on Site 2	90	0.031	0.013	0.013	0.011	0.005	0.000	0.5

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment
 Source: Refer to **Appendix I.4** for construction vibration worksheets.

MITIGATION MEASURES

Mitigation from Prior EIRs

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM NOISE-1 and PMM NOISE-2 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. These measures are not incorporated into the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional project-specific mitigation measures are necessary.

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 2 miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

No Impact. A significant impact could occur if a Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of a project site. There are no airports within a 2-mile radius of the Project Site, nor are the Project sites within an area addressed by any airport land use plan. Further, the Project Site is not near a private airstrip. As such, the Project would not expose people to excessive noise levels associated with airport use. No impact would occur.

MITIGATION MEASURES

Mitigation from Prior EIRs

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measures PMM NOISE-1 that would apply if a Lead Agency identified that a project has the potential for significant

environmental effects. This measure is not incorporated into the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional project-specific mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. For purposes of this analysis, development of the related projects would be considered to contribute to cumulative noise impacts. Noise, by definition, is a localized phenomenon and drastically reduces as distance from the source increases. As a result, only related projects and growth in the general area of the Project Site would contribute to cumulative noise impacts. Cumulative construction-noise impacts have the potential to occur when multiple construction projects in the local area generate noise within the same time frame and contribute to the local ambient noise environment. As discussed previously, the nearest sensitive receptors to Site 2 include residential uses approximately 25 feet to the west across Margo Street. The nearest sensitive receptors to Site 3 include residential uses approximately 240 feet to the east along S. Hill Street. With implementation of **Mitigation Measure MM-NOISE-1**, construction impacts would be reduced to less than significant. It is expected that, as with the Project, the related projects would implement best management practices, which would minimize any noise-related nuisances during construction. Therefore, the combined construction-noise impacts of the related projects and the Project's contribution would be less than significant.

With regard to stationary sources, cumulative significant noise impacts may result from cumulative development. Stationary sources of noise that could be introduced in the area by cumulative projects could include mechanical equipment, loading docks, and parking lots. Given that the related projects would be required to adhere to the City's noise standards, all stationary sources would be required to have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to differing construction schedules, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, the cumulative noise impacts would be less than significant.

With regard to ground-borne vibration, cumulative significant noise impacts could result if construction were occurring on the Project Site and nearby related Project Site concurrently. As shown in **Table 6-20**, the forecasted vibration levels due to on-site construction activities would not exceed the building damage significance threshold of 0.50 PPV. As such, construction vibration impacts would be less than significant. It is expected that, as with the Project, related projects would implement best management practices, which would minimize any ground-borne vibration during construction. Therefore, the combined construction-vibration impacts of the related projects and the Project's contribution would be less than significant.

XIV. POPULATION AND HOUSING

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. A significant impact could occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude.

The proposed Project Site is located within SCAG’s regional jurisdiction, which conducts plans and policies with respect to the region’s population growth, transportation programs, air quality, housing, and economic development. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region. Based on the regional growth projections in the *Connect SoCal 2020–2045 RTP/SCS*,¹¹¹ the City had an estimated permanent population of 3,933,800, a total of 1,367,000 households or dwelling units, and 1,848,300 employees in the year 2016 and an estimated population of 3,923,341 and 1,535,606 dwelling units in 2021.¹¹² Moreover, SCAG estimates the population of the City will increase to 4,771,300 residents, 1,793,000 dwelling units, and 2,135,900 employees by the year 2045. This is an increase of approximately 837,500 residents, 426,000 dwelling units, and 287,600 employees from 2016 to 2045. Furthermore, this would be an increase of 847,959 residents and 257,394 dwelling units from 2021 to 2045.

A project’s population impacts are based on an analysis of the probable number of residents associated with the number of residential dwelling units planned in the project. The project’s estimated population is then compared with official population growth forecasts for the City. Based

¹¹¹ SCAG, *Connect SoCal 2020-2045 RTP/SCS*, Technical Reports – Demographics & Growth Forecast, <https://scag.ca.gov/read-plan-adopted-final-plan>, accessed December 2021.

¹¹² State of California Department of Finance, “Population and Housing Estimates (2021),” <https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/>, accessed December 2021.

on the City's average of 2.72 persons per household as estimated by the California Department of Finance for 2021, implementation of the Project would increase the City's residential population by approximately 3,398 persons with the proposed 1,249 units proposed.¹¹³ SCAG has forecasted a population increase of 847,959 by 2045¹¹⁴ from the 2021 DOF estimate of 3,923,341 for the City of Los Angeles. The development of the Project would account for approximately 0.31 percent of the forecasted population growth.

Housing impacts are typically based on the number of new dwelling units planned within the proposed project, as compared to the housing projections. Based on the California Department of Finance data, there are 1,535,606 occupied dwelling units within the City and according to the SCAG projections that number is to increase to 1,793,000 dwelling units between 2016 and 2045. This would constitute an increase of 257,394 dwelling units, of which the Project would account for approximately 0.49 percent of the anticipated increase in dwelling units.

Site 2 would include approximately 4,178 square feet of commercial space on the ground floor of the proposed building and Site 3 would include approximately 11,277 square feet of commercial space on the ground floor of the building proposed for that site. It was estimated that approximately 52 employees would be supported associated with this commercial space.¹¹⁵ This would constitute a negligible increase within the expected 2,135,900 employees within the SCAG region by 2045. Due to the minimal amount of proposed commercial space and expected employment, the Project would generate a less than significant increase in employment and would not contribute significant impacts to growth of the area.

Development of the Project would not introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. Furthermore, for the reasons discussed above, the Project would not indirectly or directly induce substantial population growth. For these reasons, development of the Project would not conflict with SCAG growth projections or the City's growth projections and impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains a mitigation measure PMM POP-1 that would apply if the Lead Agency identified significant effects

¹¹³ Based on the 2021 Department of Finance estimates for occupancy for the City of Los Angeles, the average household size for residential units is 2.72 persons per household. 2.72 persons per household multiplied by 1,249 residential units is approximately 3,398 persons.

¹¹⁴ SCAG, *Adopted 2012 RTP Growth Forecast*, <http://www.scag.ca.gov/DataAndTools/Pages/GrowthForecasting.aspx>, accessed February 2018.

¹¹⁵ Gibson Transportation Consulting, *Transportation Assessment*, December 2019, (see **Appendix J.1.**)

from the displacement of existing housing. As the Project would not displace any existing housing, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The development of the Project Site consists of surface parking lots. Sites 2 and 3 would not displace existing people or housing, as no residences currently exist. No impact would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contains mitigation measure PMM POP-1 that would apply if the Lead Agency identified significant effects from the displacement of existing housing. As the Project would not displace any existing housing, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Project would result in an increase of approximately 3,397 net permanent residents, 1,249 dwelling units, and approximately 52 employees in the SCAG region. The related projects indicated in **Table 2-3** would result in an increase of approximately 57,240 new residents and 21,044 dwellings units to the SCAG region. Based on the Department of Finance totals, the City had an estimated permanent population of approximately 3,923,341 and 1,535,606 dwelling units in 2021. By the year 2045, SCAG forecasts that the area will increase to 4,771,300 residents and 1,793,000 dwelling units. The population and dwelling units that would be generated by the Project and related projects represent an increase of 1.5 percent and 1.5 percent, respectively. As such, the Project and the related projects would be within SCAG projections. Therefore, the Project and the related project would not exceed the growth projections of SCAG *Connect SoCal 2020–2045 RTP/SCS*. Because

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population growth which would be generated by the Project and the related projects have already been anticipated in the SCAG *Connect SoCal 2020–2045 RTP/SCS* projections, the Project's population growth would not be cumulatively considerable. Therefore, the Project's contribution to cumulative impacts to population and housing would be less than significant.

XV. PUBLIC SERVICES

<i>a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. Fire protection?

Less than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.512.1, the maximum response distance for a high density residential and commercial neighborhood is 1.5 miles for an engine company and 2 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The Project Site is served by LAFD Station No. 10, located at 1335 S Olive Street, approximately 0.24 miles southeast of the Project Site. Station No. 10 is part of 22 stations within the Central Bureau which encompasses Downtown Los Angeles and surrounding communities. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 10 to the Project Site, fire protection response is considered adequate.

Construction Impacts

Construction activities associated with the development of the Project may temporarily increase demand for fire protection and emergency medical services. 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 combustible materials and coatings. However, in accordance with existing regulations set forth by California Division of Occupational Safety and Health Administration (Cal-OSHA) and state and City Fire and Building Code requirements, construction personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities.¹¹⁶ 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 construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Operation Impacts

As stated above, the Project Site would be served by Station No. 10, located approximately 0.24 miles southeast of the Site. The second nearest station is Station No. 9 located approximately 0.74 miles east of the Site. LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route. As stated in the LAMC Section 57.512.1, the maximum response distance for a high density residential and commercial neighborhood is 1.5 miles for an engine company and 2 miles for a truck company. With two fire stations located within 1.5 miles of the Project Site, sufficient services would be available with implementation of the Project. Additionally, prior to construction, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (plan check) in order to ascertain whether further water system or site-specific improvements would be necessary. The LAFD would also review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. The development of the Project would not create substantial adverse physical impacts associated with new or altered fire facilities with implementation and impacts would be less than significant.

¹¹⁶ California Code of Regulations, Subchapter 4, Article 36, Sec. 1920.

ii. Police protection?

Less than Significant. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts.

The Project is located within the LAPD's Central Bureau jurisdiction. The Central Area Community Police Station is located at 251 E 6th Street, approximately 0.8 miles northeast of both the Site 2 and Site 3 Developments. The Central Community Police Station is staffed by approximately 400 sworn and civilian members and is responsible for all police operations in downtown Los Angeles.¹¹⁷

Construction Impacts

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, construction safety features would be implemented including security lighting and guards and erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

Operation Impacts

Implementation of the Project would result in an increase in residents and visitors, thereby generating a potential increase in the number of service calls to the site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The development of the Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and nonvisible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. The Project would also include security cameras for the residential and commercial components. These preventative and proactive security measures would decrease the number of service calls that LAPD would otherwise receive. Furthermore, any future new stations or other facilities would be subject to CEQA review.

¹¹⁷ Los Angeles Police Department, "Central Community Police Station," <https://www.lapdonline.org/lapd-contact/central-bureau/central-community-police-station/>, accessed December 2021.

As such, no substantial adverse physical impacts would be associated with new or physically altered police facilities as a result of the development of the Project. Impacts would be less than significant.

iii. Schools?

Less Than Significant Impact. The Los Angeles Unified School District (LAUSD) provides public school services to City residents for grades kindergarten through 12. The nearest LAUSD schools to the Project Site include: Ninth Street Elementary located approximately 0.8 miles southeast of the Project Site and John H. Liechty Middle School located approximately 1 mile northwest of the Project Site.

The Project would not generate a substantial number of students with implementation. Recent enrollment data from the 2018-2019 school year showed a decrease in enrollment at Ninth Street Elementary and John H. Liechty Middle School.¹¹⁸ This includes cumulative counts collected at the end of the year and consists of the total number of unduplicated primary and short-term enrollments within the academic year. According the LAUSD Developer Fee Justification Study, The Project would generate approximately 547 students for grades K-12 based on the proposed 1,249 residential units proposed for the Project.¹¹⁹ While the development of the Project would increase the school age residential population, the Applicant would be required to pay applicable school fees in accordance with California Government Code Section 65995, which are deemed by statute to fully mitigate any potentially significant impact on schools. Impacts would be less than significant.

iv. Parks?

Less than Significant Impact. The Project is located within a highly urbanized area of the South Park District of Downtown Los Angeles and has access to numerous parks and public recreation facilities within a 2-mile radius, with the closest existing park being Grand Hope Park at a distance of 0.18 miles to the north containing 2.5 acres of park space. A 0.5-acre pocket park is immediately west of the Project Site, approximately 25 ft. away, as part of an unrelated development. Pershing Square Park is located approximately 0.65 miles northeast of the Project Site and consists of approximately 5.7 acres of park space.

The development of Site 2 would meet the requirements listed in the LAMC Section 12.21(G). A total of 58,275 square feet of public and private open space would be provided by the Site 2 Development. This includes 17,900 square feet allocated for private balconies. An additional 6,452 square feet would be provided for landscaping throughout the Site. As permitted by LAMC

¹¹⁸ Education Data Partnership, "Los Angeles Unified District Summary," <http://www.ed-data.org/district/Los-Angeles/Los-Angles-Unified>, accessed December 2021.

¹¹⁹ Los Angeles Unified School District, *2020 Developer Fee Justification Study*, March 2020, https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/921/LAUSD%20Dev%20Fee%20Study%202020_Final.pdf, accessed December 2021.

Section 12.21(G), trees that cannot be accommodated on site shall be planted off site as approved by DCP through coordination with City Plants or similar organization as approved by the Department of City Planning.¹²⁰ Site 2 would also adhere to the requirements in Section 12.21(G) of the LAMC which state 100 square feet of open space per dwelling unit with less than three bedrooms and 125 square feet per dwelling unit with 3 bedrooms. With 536 units, 268 of which have 1-bedroom, 176 have 2-bedrooms, and 3 have 3-bedrooms, Site 2 would meet this requirement with a total of 58,275 square feet of open space, as shown in **Table 6-21**.

**TABLE 6-21
SITE 2 OPEN SPACE PROVIDED**

Outdoor Common Space	Square Feet
Level 5 (dog run)	1,308
Level 6 (amenity deck)	19,228
Level 51 (roof terrace)	5,212
TOTAL	25,808
Indoor Common Space	
Level 5 (fitness and lounge space)	6,787
Level 6 (fitness and lounge space)	3,057
Level 21 (lounge and covered terrace)	1,934
Level 41 (lounge and covered terrace)	1,768
Level 51 (lounge)	1,021
TOTAL	14,567
Private Open Space	
Balconies	17,900

Site 2 would include a minimum of 25 percent ground cover, shrubs or trees in the common open space area and amenities such as swimming pools, spas, picnic tables, benches, children's play areas, a dog lounge, barbecue areas and sitting areas pursuant to LAMC. Furthermore, the Project Applicant would be required to pay the Quimby Act Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the area of Site 2.¹²¹ Therefore, with the open space provided by Site 2, amenities, and payment of required fees, development of Site 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered recreation facilities.

The development of Site 3 would abide by the requirements listed in LAMC Section 12.21(G). A total of 75,425 square feet of public and private open space would be provided by Site 3 Development, as shown in **Table 6-22**. This includes 26,100 square feet allocated for private

¹²⁰ City of Los Angeles Planning Department, *Downtown Design Guide*, <https://planning.lacity.org/odocument/5d9c0525-7446-4c5d-ab3d-9b0f1eca7db8/DowntownDesignGuide.pdf>, accessed December 2021.

¹²¹ City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).

balconies. An additional 12,319 square feet would be provided for landscaping throughout the Site 3 Development.

**TABLE 6-22
SITE 3 OPEN SPACE PROVIDED**

Outdoor Common Space	Square Feet
Level 4 (dog run)	1,469
Level 5 (amenity deck)	24,311
Level 59 (roof deck)	4,689
TOTAL	56,569
Indoor Common Space	
Level 4 (dog lounge)	897
Level 5 (lounge and fitness)	9,137
Level 6 (lounge and covered terrace)	6,845
Level 59 (lounge and covered terrace)	1,977
TOTAL	18,856
Private Open Space	
Balconies	26,100

Site 3 would include a minimum of 25 percent ground cover, shrubs or trees in the common open space area and amenities such as swimming pools, spas, picnic tables, benches, children's play areas, a dog lounge, barbecue areas and sitting areas pursuant to LAMC. Furthermore, the Project Applicant would be required to pay the Quimby Act Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the area of Site 3.¹²² Therefore, with the open space provided by Site 3, amenities, and payment of required fees, development of Site 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered recreation facilities.

v. Other public facilities?

Less than Significant Impact. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, 7 regional branch libraries, 56 community branches, and 2 bookmobile units consisting of a total of 5 individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The closest branch to Site 2 is the Central Library, located at 630 W 5th Street, approximately 0.65 miles northeast of the Project Site. The development of the Project would introduce new residents to the site, however the population growth associated with the Project is within the growth projections for Downtown Los Angeles. Impacts of the development of the Project on library services would further be

¹²² City of Los Angeles Municipal Code, Section 21.10.3(a)(1), and (3).

reduced as it is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. Furthermore, the Project would be required to pay development impact fees. Given the existing library facilities in the surrounding area, no new branches or facilities are expected to be needed to serve the Project. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measures PMM PSP-1, PMM PSS-1 and PSL-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. These measures are not incorporated into the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional project-specific mitigation measures are necessary.

CUMULATIVE IMPACTS

Less than Significant. While the Project and the related projects would generate increase in demands for public services, they are part of the forecasted growth in Downton Los Angeles. In addition, the Project and the related projects would be required to pay all pertinent development fees. As such, the Project would not have a considerable contribution to significant cumulative impacts.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. As stated previously in *Subsection XV: Public Services*, development of Site 2 would abide by the requirements listed in the LAMC Section 12.21(G). A total of 58,275 square feet of public and private open space would be provided. This includes 17,900 square feet allocated for private balconies. An additional 6,452 square feet would be provided for landscaping throughout the Site. As required by LAMC Section 12.21(G), trees that cannot be accommodated on site shall be planted off site as approved by Department of City Planning (DCP) through coordination with City Plants or similar.¹²³ Pursuant to LAMC Section 12.21 G.3, the Applicant is requesting a Director’s Decision to provide 115 trees on-site in lieu of 134 trees as otherwise required. There are no plazas or courtyards proposed for Site 2 Development. The common open space would be provided on the ground floor along 11th Street to the east and curving southwest along Olive Street. This area would include rounded, raised planters to provide spatial buffers and facilitate circulation, “contour” paving pattern to reinforce the concept of the natural landscape being introduced into the urban setting, and London Plane Trees planted along the public ROW on the Olive Street side to the south. Additional drought tolerant plants such as agave and manzanita would be included around the perimeter of the building. Level 5 would feature indoor space for coworking, fitness, and a dog lounge as well as an outdoor dog run. Level 6 would feature indoor fitness and lounge as well as an outdoor amenity deck that would feature a swimming pool, outdoor decks, and planters with ornamental trees. Levels 21, 41 and 51 (the roof) would contain terraces and lounges.

¹²³ City of Los Angeles Planning Department, *Downtown Design Guide*, <https://planning.lacity.org/odocument/5d9c0525-7446-4c5d-ab3d-9b0f1eca7db8/DowntownDesignGuide.pdf>, accessed December 2021.

As stated previously in *Subsection XV: Public Services*, development of Site 3 would meet the requirements listed in LAMC Section 12.21(G). A total of 75,425 square feet of public and private open space would be provided. This includes 26,100 square feet allocated for private balconies. An additional 12,319 square feet would be provided for landscaping throughout the Site. As required by LAMC Section 12.21(G), trees that cannot be accommodated on site shall be planted off site as approved by DCP through coordination with City Plants or similar.¹²⁴ Pursuant to LAMC Section 12.21 G.3, a Director's Decision to provide 128 trees on site in lieu of 178 trees as otherwise required. There are no plazas or courtyards proposed for Site 3. The Site 3 Development would include a minimum of 25 percent ground cover, shrubs or trees in the common open space area and amenities such as swimming pools, fitness centers, outdoor decks, benches, children's play areas, a dog lounge, barbecue areas and sitting areas pursuant to LAMC. Common open space would be provided on Levels 4, 5 and 6 and on upper level terraces and lounges.

The future occupants of the Project would also utilize recreation and park facilities in the surrounding area. The Project Site is located approximately 0.18 miles south of Grand Hope Park which consists of 2.5 acres, a 0.5 acre pocket park located approximately 25 feet west of the site, and Pershing Square Park located approximately 0.65 miles northeast of the site and contains 5.7 acres of park space. Employees generated by the Project would not typically use long periods of time during the workday to visit parks and/or recreational facilities and would therefore not contribute to the future demand on recreational facilities. Furthermore, as previously stated, the Project would supply sufficient open space required for residential and commercial uses.

Pursuant to Ordinance 184,505 (Parks Dedication and Fee Update ordinance), a subdivision containing more than 50 dwelling units may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment.¹²⁵ If the project would not be dedicating land for park and recreational purposes, the project applicant shall pay a park fee pursuant to Subsection E of Section 12.33 of the LAMC. Park fees are imposed on all residential projects regardless of the number of dwelling units, unless they fall within the exemptions listed in Section 12.33(C)(3.). The Los Angeles Department of Recreation and Parks (LADRP) is responsible for calculating the required park fees owed by each residential development project, including subdivision projects, and issuing the fee calculation letters to Project applicants. As required by LAMC Section 17.12 on park fees, the Site 3 Development would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1). Park fees are calculated by LADRP, pursuant to Ordinance 184,505, and would mitigate the impact the Project would have on parks and recreational facilities. The payment of

¹²⁴ City of Los Angeles Planning Department, *Downtown Design Guide*, <https://planning.lacity.org/odocument/5d9c0525-7446-4c5d-ab3d-9b0f1eca7db8/DowntownDesignGuide.pdf>, accessed December 2021.

¹²⁵ Los Angeles Department of City Planning, *Ordinance No. 194505*, <https://planning.lacity.org/ordinances/docs/ParksDedication/UpdateOrdinance.pdf>, accessed December 2021.

this fee is deemed to provide full and complete mitigation for impacts to parks and recreational facilities. Therefore, impacts to parks and recreational facilities would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM REC-1 applicable if the Lead Agency identified significant effects on park or recreational facilities. As no significant effects on park or recreational facilities have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. A significant impact could occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. Construction workers employed for the Project are not anticipated to produce any significant demand for park and recreational facilities in the vicinity of the Project Site, nor is the construction of the Project expected to impair access to nearby parks. Accordingly, construction of the Project would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity. For these reasons, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated.

As discussed above, the Project would include common recreational facilities such as fitness centers and amenity decks with pools that are integrated into each building. Public streetscape improvements are also proposed through uniform MyFig improvements, creating a consistent streetscape between Site 2 and Site 3, and an overall improved pedestrian experience. Through object-oriented urban design, the Project Site would create new streetscape elements including rounded raised planters at Site 2, new street trees and linear planters, and future sculptural elements at Site 3. Collectively, these elements would facilitate movement, form space, and bring

an artful, visual cohesion to the intersection. Additional streetscape improvements include paving patterns, painted graphics, and lighting elements.

The Project Site is also located within 1 mile of three existing parks which consist of a total of 8.7 acres available to future residents in concert with the proposed open space. Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals would be met by seeking federal, State, and private funds to implement acquisition and development of parks and recreational facilities. The Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. For these reasons, the Project would not require the construction or expansion of recreational facilities. Accordingly, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM REC-1 applicable if the Lead Agency identified significant effects on park or recreational facilities. As no significant effects on park or recreational facilities have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

The Project would provide 133,700 square feet of open space, including two swimming areas, as well as indoor residential amenities, such as decks with landscaped open space for Site 2 and Site 3 residents including swimming areas, as well as indoor residential amenities. The Project, in combination with the related projects listed in **Table 2-3**, would be expected to increase the cumulative demand for parks and recreational facilities in the Project area. Regulatory impact fees imposed as part of the Project consider the potential impact of the Project and are adjusted accordingly. Park fees are calculated by LADRP, pursuant to LAMC Section 12.33, and would mitigate the impact the Project would have on public resources such as parks and recreational facilities. The payment of this fee is deemed to provide full and complete mitigation for impacts to parks and recreational facilities. Similar to the Project's requirement to pay fees to improve

recreation and park facilities, the related projects that include residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC Section 12.33 for providing on-site open space, which is proportionately based on the amount of new development. For these reasons, no significant cumulative impact on recreation facilities would result from the Project and related projects.

XVII. TRANSPORTATION

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Would the project 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"/>

The following summarizes and incorporates by reference information provided in the *Transportation Assessment for the DTLA South Park Properties Sites 2 & 3 Project, 1005 and 1120 S Olive Street, Los Angeles, California* prepared by Gibson Transportation Consulting, Inc. in December 2019 and provided as **Appendix J.1** to this document.

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact. Based on Table 2.1-2 in the City’s Transportation Assessment Guidelines, the following apply to the Project: Mobility Plan 2035; Plan for a Healthy Los Angeles; Central City Community Plan; and SCAG’s *Connect SoCal 2020–2045 RTP/SCS*.¹²⁶ The Project’s potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

Mobility Plan 2035

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the General Plan’s Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities:

1. Safety First;

¹²⁶ See the *Transportation Assessment* contained in **Appendix J.1** of this SCEA.

2. World Class Infrastructure;
3. Access for All Angelenos;
4. Collaboration, Communication, and Informed Choices; and
5. Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the Mobility Plan. Applicable goals and policies are identified below in **Table 6-23: Project Consistency with Mobility Plan 2035**.

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within one mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

Connect SoCal

In September 2020, SCAG adopted The *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)* named *Connect SoCal*. The *Connect SoCal 2020-2045 RTP/SCS* presents a long-term vision for the region's transportation system through Year 2045 and identifies mobility, accessibility, sustainability, and high quality of life as the principles most critical to the future of the region. Within the *Connect SoCal 2020-2045 RTP/SCS*, the strategy includes plans for High Quality Transit Areas (HQTA), Livable Corridors, and Neighborhood Mobility Areas as "key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life." In addition, the City of Los Angeles has adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes. Specifically, the City of Los Angeles Mobility Plan 2035 contains guiding and implementing policies that are relevant to transportation and circulation in the Project area. The relationship of the Project to these plans is discussed below. As described in *Subsection 3.2: Transit Priority Project Criteria* of this document, the Project is consistent with the policies of the *Connect SoCal 2020-2045 RTP/SCS*.

TABLE 6-23
PROJECT CONSISTENCY WITH MOBILITY PLAN 2035

Policy	Consistency Analysis
Chapter 1: Safety First	
1.1 Roadway User Vulnerability: Design, plan, and operate streets to prioritize the safety of the most vulnerable roadway user.	Consistent. The Project Site would add enhanced landscaping and street-level pedestrian uses to create active sidewalks along Olive Street.
1.2 Complete Streets: Implement a balanced transportation system on all streets, tunnels, and bridges using complete streets principles to ensure the safety and mobility of all users.	Consistent. The Project is proximate to streets featuring sidewalks, bike lanes, and public transit options that provide multiple mobility options for all users.
1.3 Safe Routes to Schools: Prioritize the safety of school children on all streets regardless of highway classifications.	Consistent. Improved sidewalks would border the sites, allowing for safe pedestrian circulation. During construction, the Project would require a Construction Traffic Management Plan to be implemented as a Project specific mitigation measure to minimize effects on the surrounding community.
1.4 Design Safe Speeds: Design streets to Targeted Operating Speeds as defined in the Complete Streets Design Guide.	Not applicable. The Project would not involve change to the design speed of streets.
1.5 Railroad Crossings: Reduce conflicts and improve safety at railroad crossings through design, planning, and operation.	Not applicable. The Project is not located near a railroad crossing.
1.6 Multi-Modal Detour Facilities: Design detour facilities to provide safe passage for all modes of travel during times of construction.	Consistent. During Project construction, a construction traffic management plan would be implemented to minimize effects on the surrounding community.
1.7 Regularly Maintained Streets: Enhance roadway safety by maintaining the street, alley, tunnel, and bridge system in good to excellent condition.	Not applicable. The Project would not be responsible for ongoing maintenance of public streets.
1.8 Goods Movement Safety: Ensure that the goods movement sector is integrated with the rest of the transportation system in such a way that does not endanger the health and safety of residents and other roadway users.	Consistent. During construction, a Construction Traffic Management Plan would be implemented as a Project specific mitigation measure to minimize effects on the surrounding community.
1.9 Recreational Trail Separation: Balance user needs on the City's public recreational trails.	Not applicable. No recreational trails are present near the Project.
Chapter 2: World Class Infrastructure	
2.1 Adaptive Reuse of Streets: Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	Not Applicable. The Project would not involve any changes to the design of streets.
2.2 Complete Streets Design Guide: Establish the Complete Streets Design Guide as the City's document to guide the operations and	Not applicable. Policy relates to City publication of a design guide.

Policy	Consistency Analysis
design of streets and other public rights-of-way.	
<p>2.3 Pedestrian Infrastructure: 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>Consistent. The Project would improve the existing sidewalks bordering the site.</p>
<p>2.4 Neighborhood Enhanced Network: Provide a slow speed network of locally serving streets.</p>	<p>Not applicable. The Project would not involve any changes to the design of streets.</p>
<p>2.5 Transit Network: Improve the performance and reliability of existing and future bus service.</p>	<p>Not applicable. The Project would not involve any changes to bus services.</p>
<p>2.6 Bicycle Networks: Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.</p>	<p>Consistent. The Project would provide bicycle parking spaces to facilitate safe, convenient, and comfortable bicycling.</p>
<p>2.7 Vehicle Network: Provide vehicular access to the regional freeway system.</p>	<p>Not applicable. The Project does involve changes to vehicular access to the freeway system.</p>
<p>2.8 Goods Movement: Implement projects that would provide regionally significant transportation improvements for goods movement.</p>	<p>Not applicable. The Project does not make regionally significant changes to the transportation system.</p>
<p>2.9 Multiple Networks: Consider the role of each mode enhanced network when designing a street that includes multiple modes.</p>	<p>Not applicable. The Project does not involve changes to street design.</p>
<p>2.10 Loading Areas: Facilitate the provision of adequate on and off-street loading areas.</p>	<p>Consistent. Loading areas would be provided within the site.</p>
<p>2.11 Transit Right-of-Way Design: Set high standards in designing public transit rights-of-way that considers user experience and supports active transportation infrastructure.</p>	<p>Not applicable. The Project does not involve changes to transit rights-of-way.</p>
<p>2.12 Walkway and Bikeway Accommodations: Design for pedestrian and bicycle travel when rehabilitating or installing a new bridge, tunnel, or exclusive transit right-of-way.</p>	<p>Not applicable. The Project does not involve a bridge, tunnel, or changes to transit rights-of-way.</p>
<p>2.13 Highway Preservation and Enhancement: Support the preservation and enhancement of the state highways consistent with the RTP/SCS and the goals/policies of the General Plan.</p>	<p>Not applicable. The Project does not involve changes to State highways.</p>
<p>2.14 Street Design: Designate a street's functional classification based upon its current dimensions, land use context, and role.</p>	<p>Not applicable. The Project does not involve changes to street classification.</p>
<p>2.15 Allocation of Transportation Funds: Expand funding to improve the built environment for people who walk, bike, take</p>	<p>Not applicable. The Project does not involve City transportation funds.</p>

Policy	Consistency Analysis
transit, and for other vulnerable roadway users.	
2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway.	Not applicable. The Project does not involve scenic highways.
2.17 Roadway Widening: Carefully consider the overall implications (costs, character, safety, travel, infrastructure, environment) of widening a street before requiring the widening, even when the existing right of way does not include a curb and gutter or the resulting roadway would be less than the standard dimension.	Not applicable. The Project does not involve changes to street design.
Chapter 3: Access for All Angelenos	
3.1 Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes—including goods movement—as integral components of the City’s transportation system.	Consistent. The Project is proximate to streets featuring sidewalks, bike lanes, and public transit options that provide multiple mobility modes for all users.
3.2 People with Disabilities: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Not applicable. The Project would not install infrastructure in the public right of way. Bike parking and pedestrian lighting would be contained within the project footprint and would not be built within the public right of way.
3.3 Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project is proximate to streets featuring sidewalks, bike lanes, and public transit options that provide access to jobs and other destinations in and around downtown Los Angeles.
3.4 Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent. The Project’s proximity to several public transit options would provide on-site residents access to affordable, efficient, convenient, and attractive transit services.
3.5 Multi-Modal Features: 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.	Consistent. The Project’s proximity to several public transit options would provide on-site residents access to affordable, efficient, convenient, and attractive transit services.
3.6 Regional Transportation & Union Station: Continue to promote Union Station as the major regional transportation hub linking Amtrak, Metrolink, Metro Rail, and high-speed rail service.	Not applicable. The proposed Project is not located near Union Station.

Policy	Consistency Analysis
<p>3.7 Regional Transit Connections: Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.</p>	<p>Not applicable. While the Project Site is proximate to transit, it would not alter access or service of existing transit operations.</p>
<p>3.8 Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.</p>	<p>Consistent. The Project would provide 524 bicycle parking spaces.</p>
<p>3.9 Increased Network Access: Discourage the vacation of public rights-of-way.</p>	<p>Consistent. The Project would not vacate a public right-of-way. The alley serving Site 2 (also called Margo Street) would be maintained at street level with an airspace merger 65 feet above grade. The Project would provide a pedestrian passage adjacent to the parking entrances which would link Olive Street and Margo Street with a walkway across Margo Street to the South Park Commons.</p>
<p>3.10 Cul-de-sacs: Discourage the use of cul-de-sacs that do not provide access for active transportation options.</p>	<p>Consistent. No cul-de-sacs are proposed.</p>
<p>3.11 Open Streets: Facilitate regular “open street” events and repurposing of the public right of way.</p>	<p>Not applicable. The Project would not have authority over public rights-of-way.</p>
<p>3.12 Proposed Streets: Plan for and accommodate future growth areas through the identification of “proposed streets” during the community planning process.</p>	<p>Not applicable. No new streets are proposed.</p>
<p>Chapter 4: Collaboration, Communication & Informed Choices</p>	
<p>4.1 New Technologies: Support new technology systems and infrastructure to expand access to transportation choices.</p>	<p>Consistent. The Project would include a total of 403 EV parking stalls on the Project Site. 174 EV stalls on Site 2 and 229 EV stalls on Site 3, in accordance with LAMC Sections 99.05.106.5.3.3 and 99.05.106.5.3.6.</p>
<p>4.2 Dynamic Transportation Information: Support a comprehensive, integrated transportation database and digital platform that manages existing assets and dynamically updates users with new information.</p>	<p>Not applicable. Policy addresses City technology platforms and programs.</p>
<p>4.3 Fair and Equitable Treatment: Ensure the fair and equal treatment of people of all races, cultures, incomes and education levels with respect to the development and implementation of citywide transportation policies and programs.</p>	<p>Not applicable. Policy addresses implementation of City programs.</p>
<p>4.4 Community Collaboration: Continue to support the role of community engagement in the design outcomes and implementation of mobility projects.</p>	<p>Not applicable. The Project is not a mobility project.</p>
<p>4.5 Improved Communication: Facilitate communication between citizens and the City</p>	<p>Consistent. During Project construction, a Construction Traffic Management Plan would be implemented as a Project specific mitigation</p>

Policy	Consistency Analysis
in reporting on and receiving responses to non-emergency street improvements.	measure that would include notification of street limitations.
4.6 Data-Driven Prioritization of Projects: Make the most of limited financial resources by utilizing data to prioritize transportation projects based upon safety, public health, equity, access, vulnerable social characteristics, social benefits, and/or economic benefits.	Not applicable. Policy addresses implementation of City programs.
4.7 Performance Evaluation: Evaluate performance of new transportation strategies through the collection and analysis of data.	Not applicable. Policy addresses implementation of City programs.
4.8 Transportation Demand Management Strategies: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Not applicable. The proposed Project would not require a Transportation Demand Management program; however, the Project would be within close proximity of transit services and therefore would reduce dependence on single-occupancy vehicles.
4.9 Transportation Management Organizations: Partner with the private sector to foster the success of Transportation Management Organizations (TMOs) in the City's commercial districts.	Not applicable. The Project does not propose a TMO partnership.
4.10 Public-Private Partnerships: Encourage partnerships with community groups (residents and business/property owners) to initiate and maintain enhanced public rights-of-way projects.	Not applicable. Policy addresses public rights-of-way projects.
4.11 Cohesive Regional Mobility: Communicate and partner with the Southern California Association of Governments (SCAG), Los Angeles County Metropolitan Transportation Authority (Metro), and adjacent cities and local transit operators to plan and operate a cohesive regional mobility system.	Not applicable. Policy addresses implementation of City initiatives.
4.12 Goods Movement: Increase public awareness about the importance and economic value of goods movement in the Los Angeles region.	Not applicable. Policy addresses implementation of City initiatives.
4.13 Parking and Land Use Management: Balance on-street and off-street parking supply with other transportation and land use objectives.	Consistent. The Project would provide off street parking to meet expected demand.
4.14 Wayfinding: Provide widespread, user-friendly information about mobility options and local destinations, delivered through a variety of channels including traditional signage and digital platforms.	Consistent. The Project's proximity to major transit corridors and several public transit options would encourage multimodal public transit commuting to the site. The Project would provide 524 total bicycle parking spaces to facilitate bicycle commuting with 211 long-term and 23 short-term spaces on Site 2 and 259 long-term and 31 short-term spaces on Site 3.

Policy	Consistency Analysis
4.15 Public Hearing Process: Require a public hearing for the proposed removal of an existing class II or IV bicycle facility.	Not applicable. The Project would not remove any Class II or IV bicycle facility.
Chapter 5: Clean Environments & Healthy Communities	
5.1 Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.	Consistent. The Project's proximity to several public transit options as well as pedestrian and bicycle facilities.
5.2 Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.	Consistent. The Project's proximity to transit, pedestrian and bicycle facilities would encourage reductions in VMT.
5.3 Alternative Metrics: Support a range of transportation metrics to evaluate the multiple purposes that streets serve.	Not applicable. Policy relates to City data collection initiatives.
5.4 Clean Fuels and Vehicles: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.	Consistent. The Project would include EV parking on the site in accordance with the Code.
5.5 Green Streets: Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	Not Applicable. Policy relates to stormwater capture within rights-of-way. Project would comply with the City's LID ordinance.

Other Programs, Plans, Ordinances, and Policies

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles¹²⁷ 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 Project prioritizes safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities along the Project frontage. Further, the Project supports healthy lifestyles by locating housing and jobs within a TPA and HQTA, providing bicycle parking, and designing a more comfortable environment for pedestrians. The Project provides employment and entrepreneurial opportunities for both new residents and existing community members through the development of residential and commercial space. The Project as a whole, including both Site 2 and Site 3, is estimated to generate lower VMT per capita for residents than the average for the area.¹²⁸ VMT directly

¹²⁷ Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, March 2015 (Update November 2021), https://planning.lacity.org/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf.

¹²⁸ Gibson Transportation, *Transportation Assessment*, December 2019, (see **Appendix J.1.**)

contributes to GHG emissions, so a reduced VMT per capita also reduces GHG per capita. Thus, the Project would be consistent with the goals of Plan for a Healthy Los Angeles.

Central City Community Plan

The Project Site is in the South Park neighborhood within the Central City Community Plan area. The Project aligns with each of the goals and policies of multi-family residential land uses within the Central City Community Plan, promoting the development of residential units in South Park. Further, the Project is reflective of the multi-family residential design guidelines contained in the Central City Community Plan.

The Project would not conflict with the Plan for a Healthy Los Angeles or the Central City Community Plan. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing and jobs near mass transit, as well as enhancing the pedestrian environment and providing bicycle parking. The Project would provide approximately 15,455 square feet of commercial floor area which would support the growth of neighborhoods by providing local retail services for current and future residents. Furthermore, the increased commercial uses within the Project area would reduce the VMT impact by providing retail services near an existing residential area as well as nearby various modes of public transportation. As such, the Project would not conflict with Central City Community Plan policies related to encouraging pedestrian activity and reducing VMT.

Construction Impacts

A detailed Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared as part of the Project and submitted to the City for review and approval, prior to commencing construction as described below in **PDF-TRANS-1**. The Construction Traffic Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). As such, impacts would be less than significant.

PDF-TRANS-1: A Construction Traffic Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared as part of the Project and submitted to the City for review and approval, prior to commencing construction. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions to be required to reduce effects on the surrounding community. The Construction Traffic Management Plan will be based on the specific characteristics and timing of construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- 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
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Olive Street and 11th Street, to ensure traffic safety on public rights of way.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for Phase 1 and Phase 2 (Full Buildout) of the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Construction-related vehicles/equipment shall not park on surrounding public streets.
- Coordination with Metro to address any transit stop relocations.
- Coordination with LADOT Parking Meter Division to address loss of metered parking spaces.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measures PMM TRANS-1 applicable if the Lead Agency identified significant effects on a circulation system. As no significant effects on a circulation system have been identified, this mitigation measure is not incorporated into the Project.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b) states that land use projects that result in vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. CEQA Guidelines Section 15064.3, subdivision (b), also states that transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, as is the Proposed Project, should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

The City of Los Angeles has developed a VMT Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee and adopted a threshold for Project VMT. A residential project would result in a significant VMT impact if it would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which a project is located. The current daily household VMT per capita for the Central APC is 6.0; the daily work VMT per employee is 7.6. Therefore, the threshold of 15% below this the average household VMT per capita would be 5.1.¹²⁹

Based on consultation with LADOT, the VMT Calculator was modeled for the combined buildout of Site 2 and Site 3, in order to provide the most comprehensive and conservative result. The combined Site 2 and Site 3 is expected to generate an average household VMT per capita of 4.6, below the threshold stated above. As such, Site 2 by itself would also be below the threshold. Impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM TRANS-1 applicable if the Lead Agency identified significant effects on CEQA Guidelines Section 15064.3, subdivision (b). As no significant effects due to a conflict with CEQA Guidelines Section 15064.3, subdivision (b) has been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The Project Site is currently developed with surface parking lots. The parking lot would be demolished, and two new buildings would be constructed. The proposed driveways are located in the general area of existing driveways. No additional access points or excessive driveway widening are proposed. No unusual or new obstacles are presented in the design that would be considered hazardous to motorized vehicles, nonmotorized vehicles, or pedestrians. The driveway designs do not present significant safety issues regarding

¹²⁹ Gibson Transportation, *Transportation Assessment*, December 2019, (see **Appendix J.1.**)

traffic/pedestrian conflicts. The driveways would be designed according to City standards and would be reviewed by the City Bureau of Engineering during site plan review.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM TRANS-1 that would apply if a Lead Agency identified that a project has the potential for significant environmental effects. This measure is not incorporated into the proposed Project as no significant effects have been identified.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. Result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if a project's design would not provide emergency access meeting the requirements of LAFD or would threaten the ability of emergency vehicles to access and serve the Project Site or adjacent uses. Project access points would be designed according to City standards and reviewed by the City Bureau of Engineering and the LAFD during site plan review. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, nor impede public access or travel upon public rights-of-way. Additionally, emergency access to the Project Site would be maintained during both Project construction and operation. As such, impacts related to emergency access would be less than significant.

As described above, a Construction Traffic Management Plan would be prepared as the Project as described in **PDF-TRANS-1**. The Construction Traffic Management Plan would include requirements for street closures, a detour plan, haul routes, and a staging plan, which would be prepared and submitted to the City for review and approval, prior to commencing construction. The Construction Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. Preparation and implementation of the Construction Traffic Management Plan would ensure that construction of the Project would not result in inadequate emergency access during construction.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM TRANS-2 applicable if the Lead Agency identified significant effects on emergency access. As no significant effects on emergency access have been identified, this mitigation measure is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Project in conjunction with the related projects indicated in **Table 2-3** would result in an intensification of existing traffic in an already urbanized area of Los Angeles. With regard to transportation plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Project, each related project would be subject to the LADOT approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential traffic impacts such that no significant impacts with regard to traffic would occur. As discussed above, the Project would not result in an increase in VMT per capita. As such, projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the project impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Therefore, the Project would not contribute to any significant cumulative transportation impacts when considered with related projects.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as 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 type="checkbox"/>	<input checked="" 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 (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?***

Less than Significant Impact. A Cultural Resource Review was conducted for the Project Site.¹³⁰ There are no known historic resources or archaeological resources, including tribal resources, on the Project Site that are listed or eligible for listing in the California Register of Historical Resources or the City of Los Angeles Historic-Cultural Monument List. The Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC) in March 2018 yielded negative results. PMM CULT-1 from the *Connect SoCal 2020–2045 RTP/SCS Program EIR* is incorporated into the Project to avoid potential impacts to any subsurface cultural resources, including tribal cultural resources, which may be encountered during construction of the Project. Implementation of PMM CULT-1 would ensure no significant impacts to tribal cultural resources occur during construction of the Project.

¹³⁰ PaleoWest Archaeology, *Desktop Cultural Resource Review in Support of the 1100 and 1105 Olive Street Project in Los Angeles, Los Angeles County, California*, October 31, 2023 (see **Appendix C.**)

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM TCR-1 that would apply if the Lead Agency identified significant effects on tribal cultural resources. As no significant effects on tribal cultural resources have been identified, this mitigation measure is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant Impact. A tribal cultural resource is defined by Public Resources Code Section 21074(a) as:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 21074(b) of the Public Resources Code provides that a cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. In addition, Section 21074(c) of the Public Resources Code provides that a historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

As described above, a *Cultural Resource Review* was prepared for the Project.¹³¹ There are no known historic resources or archaeological resources, including tribal resources, on the Project Site that are listed or eligible for listing in the California Register of Historical Resources or the City of Los Angeles Historic-Cultural Monument List. The Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC) in March 2018, on behalf of the Project, yielded negative results. PMM CULT-1 from the *Connect SoCal 2020–2045 RTP/SCS* Program EIR is incorporated into the Project to avoid potential impacts to any subsurface cultural resources, including tribal cultural resources, which may be encountered during construction of the Project. Implementation of PMM CULT-1 would ensure no significant impacts to tribal cultural resources occur during construction of the Project.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM TCR-1 that would apply if the Lead Agency identified significant effects on tribal cultural resources. As no significant effects on tribal cultural resources have been identified, this mitigation measure is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Less Than Significant Impact. Development of the Project, in combination with the related projects in **Table 2-3**, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the proposed Project's impacts to tribal cultural resources concluded that the proposed Project would have less than significant impacts with mitigation incorporated with respect to tribal cultural resources. Therefore, the proposed Project's incremental contribution to cumulative impacts would not be considerable, and cumulative impacts to tribal cultural resources would be less than significant.

¹³¹ PaleoWest Archaeology, *Desktop Cultural Resource Review in Support of the 1100 and 1105 Olive Street Project in Los Angeles, Los Angeles County, California*, October 31, 2023 (see **Appendix C.**)

XIX. UTILITIES AND SERVICE SYSTEMS

<i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or 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 statues and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following utilities and service systems analysis summarizes and incorporates by reference the information provided in the *Utility Infrastructure Technical Reports* prepared by KPFF Consulting Engineers in September 2021 and provided as **Appendix K** to this document.

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?*

Separate analysis is provided for the Site 2 Development and Site 3 Development to address the individual characteristics of the development on each site.

SITE 2

Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft. Water demand during construction of Site 2 would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd).¹³² Although temporary construction water use would be greater than the existing water consumption at the Site 2 Development, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of Site 2. Impacts related to the existing water infrastructure due to construction activity would therefore be less than significant.

Development of Site 2 would require construction of new, on-site water distribution lines to serve the new buildings. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Additionally, LAMC Section 57.507.3.3 identifies a fire flow requirement of 4,000 gallons per minute (gpm) flowing from 4 hydrants simultaneously for high density residential and commercial neighborhood land uses such as the Site 2 Development. Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 450 feet. If LAFD were to determine that additional fire hydrants are required during its review of the building design and LAFD requirements, such improvements would be completed as part of the development of Site 2 either on or off site within the right-of-way under the City's B-Permit process. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis. Therefore, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

¹³² KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, September 2021, **Appendix K.1**.

Wastewater Facilities

Wastewater associated with the Site 2 Development would be treated by the Hyperion Treatment Plant (HTP). During construction of Site 2, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Site 2 construction activities is not anticipated to cause any increase in wastewater flows. The development of Site 2 would require construction of new on-site wastewater infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work along the frontage of Site 2 Development may be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Stormwater Drainage Facilities

Development of Site 2 would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the surrounding stormwater infrastructure and drain to the same stormwater systems. As such, stormwater runoff from Site 2 would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the development of Site 2 either on or off site within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Impacts would be less than significant and no mitigation measures would be required.

Electric Power Facilities

The LADWP would supply electricity to Site 2 from the existing electrical system. However, development of Site 2 would require an on-site transformation facility and may require underground line extensions on public streets. All electrical facility installation and connection to

the existing system would be done in coordination and under the approval of the LADWP. A Will Serve Letter was received from LADWP stating that electric service is available and adequate capacity for Site 2 has been calculated as part of the total load growth forecast for the City.¹³³ Electricity demand during construction would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. **Table 6-24: Site 2 Estimated Electricity Demand** presents the estimated electricity consumption by the Site 2 Development during operation. As shown, operation of Site 2 is estimated to require approximately 3,853,687 kWh or a net increase of 3,841,048 kWh of electricity per year for the site.

**TABLE 6-24
SITE 2 ESTIMATED ELECTRICITY DEMAND**

Connection To:	Facility	Quantity	Electricity Demand ^(a) (kWh/yr) ^(b)
<i>Proposed Project Site</i>			
	Residential ^(c)	536 du	2,122,600
	Restaurant ^(d)	4,178 sf	184,417
	Enclosed Parking with Elevator	263,937 sf	1,546,670
<i>Total Estimated Electricity Demand for Project Site</i>			3,853,687
<i>Existing Total Electricity Demand for Project Site</i>			12,639
<i>Net Increase in Electricity Demand</i>			3,841,048

Source: KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, Appendix K.1.*

Notes: (a) the average projected load based on estimates from the CalEEMod; (b) 1 k-W (kilowatt) = 1,000 Watts; (c) All residential units classified as "Apartments High Rise"; (d) Restaurant space classified as "Fast Food Restaurant w/o Drive Thru"

Natural Gas Facilities

Development of Site 2 would increase the demand for natural gas resources. Based on analysis performed using CalEEMod software, the estimated projected natural gas loads are provided in **Table 6-25: Site 2 Estimated Natural Gas Demand** below.

¹³³ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2), Exhibit 4, September 2021, Appendix K.1.*

**TABLE 6-25
SITE 2 ESTIMATED NATURAL GAS DEMAND**

Connection To:	Facility	Quantity	Natural Gas Demand ^(a) (cf/yr)
Proposed Project Site			
	Residential ^(b)	536 du	4,815,088
	Retail ^(c)	6,153 sf	939,683
	Enclosed Parking with Elevator	594 spaces	0
Total Estimated Natural Gas Demand for Project Site			5,754,771
Existing Total Natural Gas Demand for Project Site			0
Net Increase in Natural Gas Demand			5,754,771

Source: KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy*, September 2021, **Appendix K.1**.
 Notes: (a) the average projected load based on estimates from the CalEEMod; (b) All residential units classified as “Apartments High Rise;” (c) Retail space classified as “Convenience Market (24 hour)”

Buildout of Site 2 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. All natural gas facility installation and connection to the existing system would be done in coordination and under the approval of SoCal Gas. A Will Serve Letter was received from SoCal Gas stating that gas service is available and adequate capacity for Site 2 has been calculated as part of the total load growth forecast for the City.¹³⁴ Furthermore, based on the 2016 California Gas Report, the California Energy Commission estimates natural gas capacity within SoCal Gas’ planning area will be approximately 3,775 million cubic feet/day in 2022, of which approximately 1,209 million cubic feet/day is currently unallocated.¹³⁵ Development of Site 2 would account for significantly less than 0.01 percent of the 2022 forecasted consumption in SoCalGas’s planning area. SoCalGas’ 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 SoCalGas’ service area. Furthermore, like Site 2, during project 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.

¹³⁴ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, Exhibit 5, September 2021, **Appendix K.1**.

¹³⁵ California Gas and Electric Utilities, *2018 California Gas Report*, p. 102.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. SoCalGas will 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, impacts with respect to natural gas infrastructure would be less than significant.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts related to the development of Site 2 to telecommunication facilities would be less than significant and no mitigation measures would be required.

SITE 3

Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft. Water demand during construction of Site 3 would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to

2,000 gallons per day (gpd).¹³⁶ Although temporary construction water use would be greater than the existing water consumption at the Site 3 Development, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of Site 3. Impacts related to the existing water infrastructure due to construction activity would therefore be less than significant.

Development of Site 3 would require construction of new, on-site water distribution lines to serve the new buildings. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service.

Additionally, LAMC Section 57.507.3.3 identifies a fire flow requirement of 4,000 gallons per minute (gpm) flowing from 4 hydrants simultaneously for high density residential and commercial neighborhood land uses such as the Site 3 Development. Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 450 feet. If LAFD were to determine that additional fire hydrants are required during its review of the building design and LAFD requirements, such improvements would be completed as part of the development of Site 3 either on or off site within the right-of-way under the City's B-Permit process. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis. Therefore, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Wastewater Facilities

Wastewater associated with the Site 3 Development would be treated by the Hyperion Treatment Plant (HTP). During construction of Site 3, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Site 3 construction activities is not anticipated to cause any increase in wastewater flows. The development of Site 3 would require construction of new on-site wastewater infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main.

¹³⁶ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, September 2021, **Appendix K.2**.

Although no upgrades to the public main are anticipated, minor off-site work along the frontage of Site 3 Development may be required in order to connect to the public main. All off-site work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant, and no mitigation measures would be required.

Stormwater Drainage Facilities

Development of Site 3 would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the surrounding stormwater infrastructure and drain to the same stormwater systems. As such, stormwater runoff from Site 3 would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the development of Site 3 either on or off site within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Impacts would be less than significant, and no mitigation measures would be required.

Electric Power Facilities

The LADWP would supply electricity to Site 3 from the existing electrical system. However, development of Site 3 would require an on-site transformation facility and may require underground line extensions on public streets. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP. A Will Serve Letter was received from LADWP stating that electric service is available and adequate capacity for Site 3 has been calculated as part of the total load growth forecast for the City.¹³⁷ Electricity demand during construction would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. **Table 6-26** presents the estimated electricity consumption by the Site 3 Development during operation. As shown, operation of Site

¹³⁷ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, Exhibit 4, September 2021. **Appendix K.2.**

3 is estimated to require approximately 5,591,501 kWh or a net increase of 5,575,119 kWh of electricity per year for the site.

**TABLE 6-26
SITE 3 ESTIMATED ELECTRICITY DEMAND**

Connection To:	Facility	Quantity	Electricity Demand ^(a) (kWhr/yr) ^(b)
Proposed Project Site			
	Residential ^(c)	713 du	2,823,540
	Retail ^(d)	4,221 sf	56,984
	Restaurant ^(e)	7,056 sf	311,387
	Enclosed Parking with Elevator	409,486 sf	2,399,590
Total Estimated Electricity Demand for Project Site			5,591,501
Existing Total Electricity Demand for Project Site			16,382
Net Increase in Electricity Demand			5,575,119

Source: KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy*, September 2021, **Appendix K.2**.
 Notes: (a) the average projected load based on estimates from the CalEEMod; (b) 1 k-W (kilowatt) = 1,000 Watts; (c) All residential units classified as "Apartments High Rise"; (d) Retail space classified as "Convenience Market (24 hour)"; (e) Restaurant space classified as "High Turnover (Sit down Restaurant)".

Natural Gas Facilities

Development of Site 3 would increase the demand for natural gas resources. Based on analysis performed using CalEEMod software, the estimated projected natural gas loads are provided in **Table 6-27: Site 3 Estimated Natural Gas Demand** below.

Buildout of Site 3 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. All natural gas facility installation and connection to the existing system would be done in coordination and under the approval of SoCal Gas. A Will Serve Letter was received from SoCal Gas stating that gas service is available and adequate capacity for Site 3 has been calculated as part of the total load growth forecast for the City.¹³⁸ Based on the 2016 California Gas Report, the California Energy Commission estimates natural gas capacity within SoCal Gas’ planning area will be approximately 3,775 million cubic feet/day in 2022, of which approximately 1,209 million cubic feet/day is currently unallocated. Development of Site 3 would account for significantly less than 0.01 percent of the 2022 forecasted consumption in SoCalGas’s planning area. SoCalGas’ forecasts consider projected population growth and development based on local and regional plans. Although future

¹³⁸ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, Exhibit 5, September 2021, **Appendix K.2**.

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 SoCalGas' service area. Furthermore, like Site 3, during project 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.

**TABLE 6-27
SITE 3 ESTIMATED NATURAL GAS DEMAND**

Connection To:	Facility	Quantity	Natural Gas Demand ^(a) (cf/yr)
<i>Proposed Project Site</i>			
	Residential ^(b)	713 du	6,405,146
	Retail ^(c)	4,221 sf	6,746
	Restaurant ^(d)	7,056 sf	1,585,634
	Enclosed Parking with Elevator	409,486 sf	0
<i>Total Estimated Natural Gas Demand for Project Site</i>			<i>7,997,526</i>
<i>Existing Total Natural Gas Demand for Project Site</i>			<i>0</i>
<i>Net Increase in Natural Gas Demand</i>			<i>7,997,526</i>

Source: KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, **Appendix K.2**.

Notes: (a) the average projected load based on estimates from the CalEEMod; (b) All residential units classified as "Apartments High Rise;" (c) Retail space classified as "Convenience Market (24 hour)"; (d) Restaurant space classified as "High Turnover (Sit down Restaurant)".

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. SoCalGas will 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, impacts with respect to natural gas infrastructure would be less than significant.

Telecommunication facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided

by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, impacts related to the development of Site 3 to telecommunication facilities would be less than significant and no mitigation measures would be required.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM USWW-1 applicable if the Lead Agency identified significant effects on relocation or construction of wastewater utilities. As no significant effects on relocation or construction of wastewater facilities have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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?

SITE 2

Less than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

All water installation and connections to the existing system would be done in coordination and under the approval of the LADWP. A Will Serve Letter was received by LADWP stating that water service is available and would be supplied to the Site 2 Development subject to the Water System Rules and conditions set by LADWP.¹³⁹ In addition, the LADWP 2020 Urban Water Management Plan confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The 2020 Urban Water Management Plan water demand

¹³⁹ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 2)*, Exhibit 2, September 2021, **Appendix K.1**.

projection for 2045 is approximately 710,500 acre feet/year (af/y) for average years, 746,000 af/y for single-dry years, and 727,400 af/y for multiple-dry years.¹⁴⁰

As shown in **Table 6-28: Site 2 Estimated Water Consumption** below, Site 2 would consume approximately 116,689 gpd of water. This amount would represent approximately 0.002 percent of the water supply in 2045 in average, single-dry, and multiple-dry years. Water consumption estimates have been prepared based on 120 percent of the City of LA Bureau of Sanitation sewerage generation factors for commercial categories. As mentioned, the approved SAR which is inclusive of anticipated domestic water demands shows that the existing infrastructure is sufficient to meet the water demand of the Site 2 Development. Furthermore, these projections are considered to be conservative as the Bureau of Sanitation generation rates used to calculate the estimated water consumption for Site 2 do not account for any water conservation features required by local and State policies and regulations. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2, Site 2 would be required to implement water saving features to reduce the amount of water used by the Site 2 Development including high efficiency toilet and urinals, low flow showerheads and faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and Jacuzzis. All fixtures would be required to meet applicable flush volumes and flow rates. In addition, Site 2 would be prohibited from using single pass cooling systems. Site 2 would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions.

Considering existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2045. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand. Therefore, the amount of new annual demand from the Site 2 Development would be insignificant relative to available supplies through 2045, projected growth in Los Angeles, and planned water resource development by LADWP. Moreover, the addition of 536 dwelling units as a result of the development of Site 2 would be consistent with Citywide growth, and thereby accounted for in the 2020 UWMP. Thus, the estimated water demand would be within overall General Plan projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2020 UWMP.

¹⁴⁰ Los Angeles Department of Water and Power (LADWP), *2020 Urban Water Management Plan*, https://wuedata.water.ca.gov/public/uwmp_attachments/9314518570/1.%20LADWP%202020%20UWMP.pdf, accessed December 2021.

**TABLE 6-28
SITE 2 ESTIMATED WATER CONSUMPTION**

Land Use	Sewage Generation (GPD/unit)^a	Quantity	Total Generation (GPD)
<i>Building Use:</i>			
Studio	75	89 du	6,675
1 bedroom	110	266 du	29,260
1 bedroom w/ den	110	2 du	220
2 bedroom	150	176 du	26,400
3 bedroom	190	3 du	570
Base Demand Adjustment			6,987
<i>Residential Total</i>			70,112
Synthetic Turf Areas	0	1,600 sf	0.02
Dog Lounge	0.18	1,749 sf	319
Fitness Center (lvl 5 &6)	0.22	3,518 sf	762
Office (lvl 5)	0.06	2,860 sf	172
Lounge (lvl 6, 21, 41, & 51)	12.86	277 seats	3,561
Pool and Spa		1,632 sf	156
Office (lvl 1)	0.12	1,470 sf	176
Restaurant (seating lvl 1)	30	139 seats	4,178
Restaurant (kitchen lvl 1)	0.30	2,089 sf	627
<i>Residential Amenities/Commercial Total</i>			9,950
<i>Landscaping</i>		8,612 sf	817
<i>Covered Parking</i>	0.02	258,647 sf	170
<i>Cooling Tower</i>	35.64	1,000 ton	35,640
<i>Net Land Use Total</i>			116,689

Source: KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, **Appendix K.2**.

Notes: (a) the average daily flow based on 120% of City of Los Angeles sewerage generation factors; (b) 25 sf/seat is used to determine seat count

du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet;

Additionally, under the provisions of Senate Bill 610, LADWP is required to prepare a water supply assessment (WSA) for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The types of projects that are subject to the requirements of Senate Bill 610 tend to be larger projects that may or may not have been included within the growth projections of the 2015 UWMP. In 2021, LADWP prepared and adopted a WSA for Site 2 that determined the Project was consistent with the demographic projections used by LADWP and that LADWP has water supplies available in normal, single-dry

and multiple-dry years to serve the Project.¹⁴¹ Based on the discussion above, sufficient water supplies would be available to serve the Site 2 Development and reasonably foreseeable future development during normal, dry, and multiple dry years. Accordingly, impacts would be less than significant.

SITE 3

Less than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

All water installation and connections to the existing system would be done in coordination and under the approval of the LADWP. A Will Serve Letter was received by LADWP stating that water service is available and would be supplied to the Site 3 Development subject to the Water System Rules and conditions set by LADWP.¹⁴² In addition, the LADWP 2020 Urban Water Management Plan confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The 2020 Urban Water Management Plan water demand projection for 2045 is approximately 710,500 af/y for average years, 746,000 af/y for single-dry years, and 727,400 af/y for multiple-dry years.¹⁴³

As shown in **Table 6-29: Site 3 Estimated Water Consumption** below, Site 3 would consume approximately 142,445 gpd (124.7 af/y) of water. This amount would represent approximately 0.002 percent of the water supply in 2045 in average, single-dry, and multiple-dry years. Water consumption estimates have been prepared based on 120 percent of the City of LA Bureau of Sanitation sewerage generation factors for commercial categories. As mentioned, the approved SAR which is inclusive of anticipated domestic water demands shows that the existing infrastructure is sufficient to meet the water demand of the Site 3 Development. Furthermore, these projections are considered to be conservative as the Bureau of Sanitation generation rates used to calculate the estimated water consumption of Site 3 do not account for any water conservation features required by local and State policies and regulations. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2, Site 3 would be required to implement water saving features to reduce the amount of water used by the Site 3 Development including high efficiency toilet and urinals, low flow showerheads and faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and Jacuzzis. All fixtures would be

¹⁴¹ LADWP, *Resolution 021-227*, May 25, 2021.

¹⁴² KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, Exhibit 2, September 2021, **Appendix K.2**.

¹⁴³ LADWP, *2020 Urban Water Management Plan*.

required to meet applicable flush volumes and flow rates. In addition, Site 3 would be prohibited from using single pass cooling systems. Site 3 would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions.

**TABLE 6-29
SITE 3 ESTIMATED WATER CONSUMPTION**

Land Use	Sewage Generation (GPD) ^(a)	Quantity	Total Generation (GPD)
<i>Building Use:</i>			
Studio	75	188 du	14,100
1 bedroom	110	366 du	40,250
2 bedroom	150	156 du	23,400
3 bedroom	190	3 du	570
Base Demand Adjustment			8,424
<i>Residential Total</i>			86,754
Dog Spa (lvl 4)	0.18	406 sf	74
Dog Lounge (lvl 4)	0.18	491 sf	89
Synthetic Turf Areas (lvl 4, 5, 59)	0	3,201 sf	0.05
Pool and Spa (lvl 5)		2,529 sf	241
Club Room and Lounge (lvl 5)	12.86	51 seats	656
Fitness and Spin Studio (lvl 5)	0.22	5,076 sf	1,100
Sky Lounge (lvl 59)	12.86	39 seats	501
Business/Co-Lab/Office (lvl 6)	0.06	4,269 sf	256
Office (lvl 1)	0.12	2,585 sf	310
Restaurant (seating area lvl 1)	30.00	235 seats	7,056
Restaurant (kitchen/storage lvl 1)	0.30	3,528 sf	1,058
Retail (lvl 1)	0.025	4,221 sf	106
<i>Residential Amenities/ Commercial Total</i>			11,447
<i>Landscaping</i>		13,291 sf	1,262
<i>Covered Parking</i>	0.02	325,995 sf	214
<i>Cooling Tower</i>	35.64	1,200 ton	42,768
Net Total			142,445

Source: KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, **Appendix K.2**.

Notes: (a) the average daily flow based on 120% of City of Los Angeles sewerage generation factors; (b) 25 sf/seat is used to determine seat count

du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet;

Considering existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2045. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand. Therefore, the amount of new annual demand from the Site 3 Development would be insignificant relative to available supplies through 2045, projected growth in Los Angeles, and planned water resource development by LADWP. Moreover, the addition of 713 dwelling units as a result of the development of Site 3 would be consistent with Citywide growth, and thereby accounted for in the 2020 UWMP. Thus, the estimated water demand would be within overall General Plan projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2020 UWMP.

Additionally, under the provisions of Senate Bill 610, LADWP is required to prepare a water supply assessment (WSA) for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The types of projects that are subject to the requirements of Senate Bill 610 tend to be larger projects that may or may not have been included within the growth projections of the 2015 UWMP. In 2021, LADWP prepared and adopted a WSA for Site 2 that determined the Project was consistent with the demographic projections used by LADWP and that LADWP has water supplies available in normal, single-dry, and multiple-dry years to serve the Project.¹⁴⁴

Based on the discussion above, sufficient water supplies would be available to serve the Site 3 Development and reasonably foreseeable future development during normal, dry, and multiple dry years. Accordingly, impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM USWS-1 applicable if the Lead Agency identified significant effects on water supplies. As no significant effects on water supplies have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

¹⁴⁴ LADWP, *Resolution 021-228*, May 25, 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?*

SITE 2

Less than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Construction Impacts

Site 2 would require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated. A Construction Traffic Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Traffic Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, impacts on wastewater associated with construction activities would be less than significant.

Operational Impacts

Estimated sewer flows were based on the sewer generation factors for the uses proposed for the Site 2 Development. Based on the type of use and generation factors, Site 2 would generate approximately 112,762 gallons per day (gpd) of wastewater. Wastewater generation estimates have been prepared based on the City of LA Bureau of Sanitation sewerage generation factors for residential and commercial categories and are summarized in **Table 6-30: Site 2 Estimated Sewage Generation** below.

The existing capacity of the sewer line along Olive Street has a capacity of 4.26 cfs (2.76 MGD) (see **Appendix K.1**). Sewage generation for the Site 2 Development is approximately 112,762 gpd, which represents 4.06 percent of the existing pipe's capacity. Due to this fact, and the approved sewer capacity availability request (SCAR) generated by the Bureau of Engineering-Wastewater Engineering Services Division,¹⁴⁵ impacts on wastewater infrastructure would be less than significant.

¹⁴⁵ KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Exhibit 3), September 2021, **Appendix K.1**.

**TABLE 6-30
SITE 2 ESTIMATED SEWAGE GENERATION**

Land Use	Sewage Generation (GPD/unit) ^(a)	Quantity	Total Generation (GPD)
Building Use:			
Studio	75	89 du	6,675
1 bedroom	110	268 du	29,480
2 bedroom	150	176 du	26,400
3 bedroom	190	3 du	570
Restaurant	30	139 kgsf ^(b)	4,170
Swimming Pool ^(c)		41,121 gpd	41,121
Spa/Jacuzzi ^(c)		4,346 gpd	4,346
Total			112,762

Source: KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, Appendix K.1.*

Notes: (a) the average daily flow based on 120% of City of Los Angeles sewerage generation factors; (b) 30 sf/seat is used to determine seat count; (c) Volumes represent total anticipated volume of pool/spa. It is understood that, by including the full volumes, this analysis represents a "worst-case scenario" as emptying the pool/spa daily is not anticipated. du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet;

The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).¹⁴⁶ The proposed wastewater generation for Site 2 is approximately 0.112 mgd (see **Appendix K.1**). This is equal to far less than one percent of the Hyperion Treatment Plant's capacity where wastewater for the Site 2 Development would be treated. Consequently, impacts on wastewater treatment capacity are less than significant.

SITE 3

A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Construction Impacts

Site 3 would require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated. A Construction Traffic

¹⁴⁶ City of Los Angeles Department of Public Works, Bureau of Sanitation, "Water Reclamation Plants," https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oeplwkld_4&_afLoop=28344654751341747#!, accessed December 2021.

Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Traffic Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, impacts on wastewater associated with construction activities would be less than significant.

Operation Impacts

The base estimated sewer flows were based on the sewer generation factors for the uses proposed for the Stie 3 Development. Based on the type of use and generation factors, Site 3 would generate approximately 86,486 gallons per day (gpd) of wastewater. Wastewater generation estimates have been prepared based on the City of LA Bureau of Sanitation sewerage generation factors for residential and commercial categories and are summarized in **Table 6-31: Site 3 Estimated Sewage Generation** below.

**TABLE 6-31
SITE 3 ESTIMATED SEWAGE GENERATION**

Land Use	Sewage Generation (GPD) ^a	Quantity	Total Generation (gpd)
Building Use:			
Studio	75	188 du	14,100
1 bedroom	110	366 du	40,260
2 bedroom	150	156 du	23,400
3 bedroom	190	3 du	570
Restaurant	30	235 seats	7,050
Retail	25	4,221 kgsf	106
Swimming Pool ^(c)	66,030	1	66,030
Spa/Jacuzzi ^(c)	4,582	1	4,582
Total			156,098

Source: KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2021, **Appendix K.2**.
 Notes: (a) the average daily flow based on 120% of City of Los Angeles sewerage generation factors; (b) 25 sf/seat is used to determine seat count; (c) Volumes represent total anticipated volume of pool/spa. It is understood that, by including the full volumes, this analysis represents a “worst-case scenario” as emptying the pool/spa daily is not anticipated.
 du = dwelling unit; afy = acre-feet per year; gpd = gallons per day; ksf = thousand square feet;

The capacity of approximately 4.26 cfs (2.76 MGD) and the sewer line in 11th Street has a capacity of approximately 1.26 cfs (2.0 MGD). Sewage generation for the Site 3 Development is approximately 156,098 gpd, which represents 5.66 percent of the existing pipe in Olive Street’s capacity. Due to this fact, and the approved sewer capacity availability request (SCAR) generated

by the Bureau of Engineering-Wastewater Engineering Services Division, impacts on wastewater infrastructure would be less than significant.¹⁴⁷

The existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (consisting of 450 mgd at the Hyperion Treatment Plant, 80 mgd at the Donald C. Tillman Water Reclamation Plant, Reclamation Plant, and 20 mgd at the Los Angeles–Glendale Water Reclamation Plant).¹⁴⁸ The proposed wastewater generation for Site 3 is approximately 0.156 mgd (see **Appendix K.2**). This is equal to far less than one percent of the Hyperion Treatment Plant’s capacity where wastewater for the Site 3 Development would be treated. Consequently, impacts on wastewater treatment capacity are less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM USWW-1 that would apply if the Lead Agency identified significant effects on wastewater utility facilities. As no significant effects on wastewater facilities have been identified, this mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

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. A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), or the

¹⁴⁷ KPFF, *Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Site 3)*, Exhibit 3, September 2021, **Appendix K.2**.

¹⁴⁸ City of Los Angeles Department of Public Works, Bureau of Sanitation, “Water Reclamation Plants.”

Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

In response to reduced landfill capacities, the State of California passed Assembly Bill (AB) 939, the California Integrated Waste Management Act, in 1989. This legislation requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste prevention efforts. AB 939 also established the California Integrated Waste Management Board (CIWMB), the State agency designated to oversee, manage, and track California's solid waste generation each year. AB 939 requires jurisdictions to maintain 50 percent waste diversion. The purpose of AB 939 is to "reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible." AB 939 requires jurisdictions to utilize "integrated waste management," which includes a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the least adverse impact on human health and the environment.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill.

It is unknown at this time which landfill location would be used. However, the County of Los Angeles Department of Public Works prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. As described in the County's most recent report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. As of December 2014, the total available capacity of the ten permitted landfills within Los Angeles County was 112 million tons, with a reported 2014 annual disposal of 4.5 million tons.¹⁴⁹

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be generated during construction of the Project and would be collected by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility.

As shown in **Table 6-32: Site 2 Solid Waste Generation**, development of the Project would generate an estimated increase of approximately 5,043 pounds per day of solid waste. This estimate is conservative because it does not factor in any recycling or waste diversion programs.

¹⁴⁹ County of Los Angeles, Department of Public Works, *2014 Annual Report, Los Angeles Countywide Integrated Waste Management Plan* (December 2015).

The permitted County landfills have adequate capacity to accommodate the increase in solid waste generated from the Project. Therefore, solid waste impacts would be less than significant.

**TABLE 6-32
SITE 2 SOLID WASTE GENERATION**

Type of Use	Size	Waste Generation Rate (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	1,249 du	4 lb./du/day	4,966
Commercial	15,455 sq. ft.	5 lb./1000 sq. ft./day	77
Solid Waste Generation			5,043

Source: CalRecycle, *Estimated Solid Waste Generation Rates*, accessed September 2022, <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>.

Note: sq. ft. =square feet; du = dwelling units; lb. = pounds.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS Program EIR* contained mitigation measure PMM USSW-2 applicable if the Lead Agency identified significant potential adverse effects related to solid waste. As no significant potential adverse effects on regulations related to solid waste have been identified, the mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS Program EIR* is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

e. *Would the Project comply with federal, state, and local statutes and regulations related to solid waste?*

SITE 2

Less than Significant Impact. A significant impact could occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The development of the Project would generate solid waste that is typical of a residential mixed-use building. Solid waste generated by the Project would be handled by private waste collection services. Private waste haulers operating with the City of Los Angeles must obtain an AB 939 Compliance Permit,

indicating compliance with applicable regulations related to solid waste.¹⁵⁰ Compliance indicate that impacts would be less than significant.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained mitigation measure PMM USSW-2 that would apply if the Lead Agency identified significant potential adverse effects related to solid waste. As no significant potential adverse effects on regulations related to solid waste have been identified, the mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

CUMULATIVE IMPACTS

Water

Less than Significant Impact. Based on the discussion above, implementation of the Project would increase demand for water services provided by the City’s water supply system. Through its UWMP, LADWP anticipates its projected water supplies will meet demand through the year 2045. In terms of the City’s overall water supply condition, any related project that is consistent with the City’s General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG’s *Connect SoCal 2020–2045 RTP/SCS* and is located in the service area is considered to have been included in LADWP’s water supply planning efforts so that projected water supplies would meet projected demands. Future development projects within the service area of LADWP are subject to the locally mandated water conservation programs, and citywide water conservation efforts are also expected to partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. For these reasons, cumulative impacts related to water supply would be less than significant.

¹⁵⁰ City of Los Angeles Bureau of Sanitation, “Waste Hauler Permit Program,” https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-c/s-lsh-wwd-s-c-whp?_afLoop=12832845686409439&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=pzm7lezn4_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D12832845686409439%26_afWindowMode%3D0%26_adf.ctrl-state%3Dpzm7lezn4_5, accessed December 2021.

Wastewater

Less than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The development of the two Projects would not cause of significant impact on wastewater. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts would be less than significant.

Stormwater

Less than Significant Impact. Development of the Project in conjunction with the five related projects would result in an intensification of existing prevailing land uses in an already urbanized area of Los Angeles and could further increase regional demands on stormwater facilities. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities. As discussed earlier, stormwater on both the East and West Sites would be collected on the respective site, 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 $\frac{3}{4}$ inches of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Project and the five related projects would not result in cumulative stormwater impacts.

Solid Waste

Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste or impair the attainment of solid waste reduction goals. The County of Los Angeles Department of Public Works prepares an annual report on solid waste management in the County in order to help meet long-term needs and maintain adequate capacity. As described in the County's most recent report, a shortfall in permitted solid waste disposal capacity within the County is not anticipated to occur under forecasted growth and ongoing municipal efforts at waste reduction and diversion. Therefore, the Project would not make a considerable contribution to a significant cumulative impact.

Electricity

Less than Significant Impact. As with the Project, during construction and operation, other future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including anti-idling construction vehicle regulations, the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, as amended to be

more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As stated in LADWP's 2016 Power Integrated Resource Plan, LADWP will 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. The Power Integrated Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Like the Project, related 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 their respective needs. Project Applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. The contribution of the Project to cumulative impacts with respect to electricity plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Natural Gas

Less than Significant Impact. As with the Project, future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed. SoCalGas will continue to expand delivery capacity, if necessary, to meet demand increases within its service area. Related projects within its service area, including the Project and the five related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. The Project's contribution to cumulative impacts with respect to natural gas plans as well as infrastructure would not be cumulatively considerable and cumulative impacts would be less than significant.

Telecommunications

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. 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.

XX. WILDFIRE

<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 of 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 slow instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

SITE 2

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.¹⁵¹ In addition, the Project Site is not located on a designated disaster evacuation route according to the City’s General Plan Safety Element.¹⁵² Furthermore, the Project would not impair the use of other rights of way. Therefore, adopted emergency response plans or emergency evacuation plans would not be substantially impaired. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior

¹⁵¹ City of Los Angeles, ZIMAS, “Parcel Profile Report,” zimas.lacity.org, accessed July 2019.

¹⁵² City of Los Angeles Department of City Planning (DCP), *General Plan*, “Safety Element” (1996), Exhibit H: Critical Facilities and Lifeline Systems, https://files.ceqanet.opr.ca.gov/221458-6/attachment/ZCwECAZaE2n8EukiyVA0ANYfdy6TZY8k6JQNLxSmnjBhlmW-G9JkfkJTM4_HdFlaZwOJr5iKxv6c4B9x0, accessed September 2022.

applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR contained a mitigation measure applicable if the Lead Agency identified significant effects on emergency plans. As no significant effects on emergency plans have been identified, the mitigation measure from the SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR is not incorporated into the Project.

Project-Specific Mitigation

No additional mitigation measures are necessary.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.¹⁵³ The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.¹⁵⁴ Accordingly, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain any mitigation measures applicable to development projects related to wildfire impacts.

Project-Specific Mitigation

No additional mitigation measures are necessary.

c. Require the installation of or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.¹⁵⁵ The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. The Project would utilize existing roadway and utility infrastructure and would not require the construction or maintenance

¹⁵³ City of Los Angeles, *ZIMAS*, "Parcel Profile Report," zimas.lacity.org, accessed July 2019.

¹⁵⁴ City of Los Angeles DCP, *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

¹⁵⁵ City of Los Angeles, *ZIMAS*, "Parcel Profile Report," zimas.lacity.org, accessed July 2019.

of existing infrastructure. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.¹⁵⁶ As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain any mitigation measures applicable to development projects related to wildfire impacts.

Project-Specific Mitigation

No additional mitigation measures are necessary.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slow instability, or drainage changes?

No Impact. The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.¹⁵⁷ The Project Site is located within an urbanized area of the City and does not include wildlands or high-fire-hazard terrain. In addition, the Project Site is not identified by the City as being located within an area susceptible to fire hazards.¹⁵⁸ As previously discussed, the Project Site is not susceptible to potential flooding or landslide, nor would the Project result in potential drainage changes. As such, no impacts would occur.

MITIGATION MEASURES

Mitigation from Prior EIRS

Public Resources Code (PRC) §21155.2 requires that a Transit Priority Project evaluated in a SCEA incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The SCAG *Connect SoCal 2020–2045 RTP/SCS* Program EIR did not contain any mitigation measures applicable to development projects related to wildfire impacts.

Project-Specific Mitigation

No additional mitigation measures are necessary.

¹⁵⁶ City of Los Angeles DCP, *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

¹⁵⁷ City of Los Angeles, *ZIMAS*, "Parcel Profile Report," zimas.lacity.org, accessed July 2019.

¹⁵⁸ City of Los Angeles DCP, *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

CUMULATIVE IMPACTS

Less Than Significant Impact. The related projects in the surrounding area, indicated in **Table 2-3**, do not contain any wildland features and are not located in Very High Fire Hazard Severity Zones.¹⁵⁹ As such, the related projects would have no cumulative wildfire impacts. Additionally, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. 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. Based on the above considerations, the Project Site would not result in a cumulatively considerable contribution to significant cumulative wildfire impacts.

¹⁵⁹ City of Los Angeles DCP, *General Plan*, "Safety Element" (1996), Exhibit D: Selected Wildfire Hazard Areas in the City of Los Angeles.

XXI. 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 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, 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Does the project have the potential to 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, 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. As discussed in *Subsection IV: Biological Resources*, the Project would not have the potential to 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. As discussed in *Subsection V: Cultural Resources* Project impacts with respect to archaeological resources would be less than significant. In addition, as discussed in *Subsection VII: Geology and Soils* Project impacts with respect to paleontological resources would be less than significant. As discussed in *Subsection XVIII: Tribal Cultural Resources* with implementation of mitigation, Project impacts related to Tribal Cultural Resources would be less than significant. As such, the Project would not eliminate important examples of the major periods of California history or prehistory. Therefore, Project impacts would be less than significant.

- 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. A list of 63 related projects was obtained by Gibson Transportation from information provided by LADCP and LADOT, as well as recent studies of projects in the area.¹⁶⁰ This list provides a cumulative scenario of foreseeable development within Downtown Los Angeles. The buildout years of many of these Related Projects are uncertain and may be well beyond the buildout year of the Project, and some may never be approved or developed. As such, this list is considered to substantially overestimate the actual growth in downtown Los Angeles. Additionally, the cumulative impacts for each checklist topic listed in **Section 5.0: SCEA Initial Study Checklist** of this SCEA have been addressed. As discussed in this section, the Project would not contribute a cumulatively considerable impact to any significant cumulative impacts.

- c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less than Significant. As discussed in *Subsection III: Air Quality*, Project impacts during both construction and operation would be less than significant. As discussed in *Subsection VIII: Greenhouse Gas Emissions*, the Project would not result in any significant impacts related to GHG emissions. As discussed in *Subsection IX: Hazards and Hazardous Materials* with implementation of mitigation, Project impacts related to hazards and hazardous materials would be less than significant. As discussed in *Subsection XIII: Noise*, with implementation of mitigation, the Project's construction-related noise impacts would be less than significant. The Project's operational noise and vibration impacts (during both construction and operation) would be less than significant. Therefore, with implementation of the mitigation measures outlined in **Section 5.0** of this SCEA, the Project would not have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly.

¹⁶⁰ See *Transportation Assessment* in **Appendix J.1**.