CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY: City of Los Angeles		**COUNCIL DISTRICT:** 1
PROJECT TITLE: Highland Park Townhome Project	**ENVIRONMENTAL CASE:**	**CASE NO:** ENV-2015-952-MND

PROJECT LOCATION: 5101 to 5123 E. Echo Street, Los Angeles, CA 90042

PROJECT DESCRIPTION:

The Proposed Project would include the removal of the existing vacant paved lot and the construction of townhomes. The proposed development on the Project Site would involve a small lot subdivision, which would consist of 24 single family home lots. The development on each lot would consist of a fourplex, 3-story townhome style sturctures. A total of 6 structures would be constructed, with each structure containing 4 town homes (small lot subdivision lots) a piece. Each structure would be separated by 1" to 6" of airspace . The ground floor of each unit would provide a two-car parking garage located on the first floor of each unit. The townhomes would be approximately 39.25 feet to the top of the roof. Bedrooms are located on the first and third floors, and other amenities are located on each of the three floors.

The Project Applicant is requesting approval of a zone change, Vesting Tenative Tract Map for a Small Lot Subdivision, Specific Plan Project Permit Compliance Review (SPP), and Certificate of Compatibility (CCMP), and Director's interpretation for the assembly of lots within the Specific Plan, as part of the discretionary approvals for the Proposed Project. The Project Applicant will also seek approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to the following: excavation, shoring, grading, foundation, and building and tenant improvements for the Project Site.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Williams Homes
C/O Carl Steinberg
21080 Centre Pointe Parkway
Santa Clarita, CA 91350

FINDING: The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of significance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

NAME OF PERSON PREPARING FORM	**TITLE**	**TELEPHONE NUMBER**
Greg Shoop	City Planner	213-978-1243
ADDRESS 200 North Spring Street, Room 621 Los Angeles, CA 90012	**SIGNATURE (Official)** Shana Nunn	**DATE** JULY 22, 2015

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (*CEQA Guidelines* Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** 1	**DATE:**
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2015-952-MND	**RELATED CASES:** VTTM-73320-SL APCE-2015-951-ZC-DI-SPP-CCMP	
PREVIOUS ACTIONS CASE NO.	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

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PROJECT DESCRIPTION: See above and supporting exhibits and tables in the attached Initial Study prepared by Meridian Consultants, dated May 2015.

ENVIRONMENTAL SETTING:

The Project Site is located in the Highland Park neighborhood of Los Angeles, within the Avenue 57 Transit Oriented District (TOD) Neighborhood Specific Plan, which is located within the boundaries of the Northeast Los Angeles Community Plan. The Project Site includes approximately 39,108 square feet of lot area (i.e., 0.89 acres) and is currently developed as a vacant paved lot.

The Project site is located within a the Highland Park-Garavanza Historic Preservation Overlay Zone. The site is not located within a Very High Fire Hazard Severity zone, Flood Zone, Alquist-Priolo Fault Zone, landslide zone, or liquefaction zone.

Further details of the existing Project Site and surrounding area are provided in the Initial Study (IS) prepared by Meridian Consultants dated June 2015.

PROJECT LOCATION: 5101 to 5123 E. Echo Street, Los Angeles, CA 90042

COMMUNITY PLAN AREA: Central City **STATUS:** ☐ Preliminary ☒ Does Conform to Plan ☐ Proposed ☐ Does NOT Conform to Plan ☒ ADOPTED in 2003		**AREA PLANNING COMMISSION:** East Los Angeles	**CERTIFIED NEIGHBORHOOD COUNCIL:** Historic Highland Park
EXISTING ZONING: [Q]C4-2D-HPOZ	**MAX DENSITY ZONING:** 3:1	**LA River Adjacent:** No	
GENERAL PLAN LAND USE: Neighborhood Commercial	**MAX. DENSITY PLAN:** 3:1	**PROPOSED PROJECT DENSITY:** 1.3:1 FAR	

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.

Signature	Title	213-978-1243 Phone

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures that 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.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐ **AESTHETICS**	☐ **GREENHOUSE GAS EMISSIONS**	☐ **POPULATION AND HOUSING**
☐ **AGRICULTURE AND FOREST RESOURCES**	☐ **HAZARDS AND HAZARDOUS MATERIALS**	☒ **PUBLIC SERVICES**
☐ **AIR QUALITY**	☐ **HYDROLOGY AND WATER QUALITY**	☐ **RECREATION**
☒ **BIOLOGICAL RESOURCES**	☐ **LAND USE AND PLANNING**	☐ **TRANSPORTATION AND TRAFFIC**
☐ **CULTURAL RESOURCES**	☐ **MINERAL RESOURCES**	☐ **UTILITIES**
☐ **GEOLOGY AND SOILS**	☐ **NOISE**	☒ **MANDATORY FINDINGS OF SIGNIFICANCE**

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)
Background

PROPONENT NAME: Williams Homes, C/O Carl Steinberg

PHONE NUMBER: 661-222-9207

APPLICANT ADDRESS: 21080 Centre Pointe Parkway, Santa Clarita, CA 91350

AGENCY REQUIRING CHECKLIST: City of Los Angeles Department of City Planning **DATE SUBMITTED:**

PROPOSAL NAME (If Applicable): Highland Park Townhome Project

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
4.1. AESTHETICS					
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
4.2. AGRICULTURE AND FOREST RESOURCES					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
4.3 AIR QUALITY					
a.	Conflict with or obstruct implementation of the SCAQMD or congestion management plan?	☐	☐	☒	☐
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4.4 BIOLOGICAL RESOURCES					
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by The California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☒	☐	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
4.5 CULTURAL RESOURCES					
a.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?	☐	☐	☒	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
4.6 GEOLOGY AND SOILS					
Would the project:					
a.	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? Refer to division of mines and geology special publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
4.7 GREENHOUSE GAS EMISSIONS					
Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
4.8 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
4.9 HYDROLOGY AND WATER QUALITY					
Would the project:					
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
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 result in substantial erosion or siltation on or offsite?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?	☐	☐	☐	☒

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
e.	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?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☐	☒
g.	Place housing within a 100-year flood plain as mapped on federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
4.10 LAND USE AND PLANNING					
Would the project:					
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
4.11 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
4.12 NOISE					
Would the project:					
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
4.13 POPULATION AND HOUSING					
Would the project:					
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)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
4.14 PUBLIC SERVICES					
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?	☐	☒	☐	☐
ii.	Police protection?	☐	☒	☐	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
4.15 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
4.16 TRANSPORTATION AND TRAFFIC					
Would the project:					
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non---motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass	☐	☐	☒	☐
b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐
f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
4.17 UTILITIES & SERVICE SYSTEMS					
Would the project:					
a.	Exceed wastewater treatment requirements of the applicable regional water quality control board?	☐	☐	☐	☒
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

		Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐
e.	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?	☐	☐	☒	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☒	☐	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
4.18 MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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?	☐	☐	☐	☒
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (ATTACH ADDITIONAL SHEETS IF NECESSARY)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). Based on Applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including, but not limited to, reference materials indicated above, field investigation of the Project Site, and other reliable reference materials known at the time.

Project-specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the Applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the *City of Los Angeles's Adopted Thresholds Guide* and *CEQA Guidelines*, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The Project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2015-952-MND** and the associated case(s), **VTT-73320-SL**, and **APCE-2015-951-ZC-DI-SPP-CCMP**. Finally, based on the fact that these impacts can be feasibly mitigated to a less-than-significant level, and based on the findings and thresholds for Mandatory Findings of Significance as described in State *CEQA Guidelines*, section 15065, the overall project impacts(s) on the environment (after mitigation) **will not**:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat
- Cause a fish or wildlife habitat to drop below self-sustaining levels
- Threaten to eliminate a plant or animal community
- Reduce number, or restrict range of a rare, threatened, or endangered species
- Eliminate important examples of major periods of California history or prehistory
- Achieve short-term goals to the disadvantage of long-term goals

- Result in environmental effects that are individually limited but cumulatively considerable
- Result in environmental effects that will cause substantial adverse effects on human beings

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced previously and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses, and phone numbers, visit the City's website at http://www.lacity.org; City Planning and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/; or EIR Unit, City Hall, 200 N Spring Street, Room 763; Parcel Information –; or City's main website under the heading "Navigate LA."

PREPARED BY:	TITLE:	TELEPHONE NO.:	DATE:

Environmental Analysis Explanation Table

Impact	Explanation	Mitigation Measures
4.1 AESTHETICS		
a. No Impact	See environmental analysis provided in the Initial Study (IS) prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.2 AGRICULTURAL RESOURCES		
a. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
e. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.3 AIR QUALITY		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.

Impact	Explanation	Mitigation Measures
e. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.4 BIOLOGICAL RESOURCES		
a. Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	**IV-20**
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
e. Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	**IV-70** **IV-80**
f. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.5 CULTURAL RESOURCES		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.6 GEOLOGY AND SOILS		
a.i. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
a.ii. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
a.iii. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.

Impact	Explanation	Mitigation Measures
a.iv. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
e. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.7 GREENHOUSE GAS EMISSIONS		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.8 HAZARDS AND HAZARDOUS MATERIALS		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
e. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
f. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
g. Less than Significant	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required

Impact	Explanation	Mitigation Measures
h. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.9 HYDROLOGY AND WATER QUALITY		
a. Less than Significant	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
e. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
f. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
g. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
h. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
i. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
j. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.10 LAND USE AND PLANNING		
a. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.

Impact	Explanation	Mitigation Measures
4.11 MINERAL RESOURCES		
a. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.12 NOISE		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
c. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required
e. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
f. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.13 POPULATION AND HOUSING		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.14 PUBLIC SERVICES		
a.i. Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	**XIV-10**
a.ii. Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	**XIV-30**
a.iii. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants	No mitigation measures are

Impact	Explanation	Mitigation Measures
	dated June 2015.	required
a.iv. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
a.v. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.15 RECREATION		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.16 TRANSPORTATION AND TRAFFIC		
a. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
e. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
f. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.17 UTILITIES		
a. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
d. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants	No mitigation measures are required.

Impact	Explanation	Mitigation Measures
	dated June 2015.	
e. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
f. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
g. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
4.18 MANDATORY FINDINGS OF SIGNIFICANCE		
a. No Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
b. Less than Significant Impact	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	No mitigation measures are required.
c. Less than Significant with Project Mitigation	See environmental analysis provided in the IS prepared by Meridian Consultants dated June 2015.	Applicable mitigation measures stated from **Section 4.1** to **Section 4.17**.

MITIGATION MEASURES

4.1 Aesthetics

No mitigation measures are required.

4.2 Agriculture and Forestry Resources

No mitigation measures are required.

4.3 Air Quality

No mitigation measures are required.

4.4 Biological Resources

IV-20 **Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)**

Project activities (including disturbances to native and nonnative 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 of kill (California Department of Fish and Game Code Section 86).

If project activities cannot feasibly avoid the breeding bird season, beginning 30 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 properties adjacent to the project site, 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 nest is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species 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 or as determined by a qualified biological monitor, shall be postponed until

the nest is vacated and juveniles have fledged and 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 record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

IV-70 Tree Removal (Locally Protected Species)

Environmental impacts may result due to the loss of protected trees on the site. However, these potential impacts will be mitigated to less than significant level by the following measures:

- All protected tree removals require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval (213-847-3077), prior to implementation of the Report's recommended measures.
- A minimum of two trees (a minimum of 48-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.
- Bonding (Tree Survival):

a. The applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision maker guaranteeing the survival of trees required to be maintained, replaced or

relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new oak tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's oak tree bond may be exonerated.

b. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the oak trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

IV-80 **Tree Removal (Non-Protected Trees)**

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multitrunked, as measured 54 inches above the ground) nonprotected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

4.5 Cultural Resources

No mitigation measures are required.

4.6 Geology and Soils

No mitigation measures are required.

4.7 Greenhouse Gas Emissions

No mitigation measures are required.

4.8 Hazards and Hazardous Materials

No mitigation measures are required.

4.9 Hydrology and Water Quality

No mitigation measures are required.

4.10 Land Use and Planning

No mitigation measures are required.

4.11 Mineral Resources

No mitigation measures are required.

4.12 Noise

No mitigation measures are required.

4.13 Population and Housing

No mitigation measures are required.

4.14 Public Services

XIV-10 Fire Protection

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

XIV-30 Police (Design Guidelines)

The plans shall incorporate the Design Guidelines (defined in the following sentence) relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

4.15 Recreation

No mitigation measures are required.

4.16 Transportation and Traffic

No mitigation measures are required.

4.17 Utilities and Service Systems

No mitigation measures are required.

4.18 Mandatory Findings of Significance

Applicable mitigation measures stated from **Section 4.1** to **Section 4.17** would be required.

Initial Study

Highland Park Townhome Project

City of Los Angeles

Prepared for:

City of Los Angeles
Department of City Planning
Environmental Analysis Section
200 North Spring Street, Room 750
Los Angeles, CA 90012

Prepared by:

Meridian Consultants LLC
910 Hampshire Road, Suite V
Westlake Village, California 91361

June 2015

TABLE OF CONTENTS

Appendices (On CD in back sleeve)

LIST OF FIGURES

LIST OF TABLES

LIST OF ACRONYMS

AAI	All Appropriate Inquiry
AB	Assembly Bill
afy	Acre-feet per year
ANSI	American National Standard Institute
AP	Alquist-Priolo
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
AVO	average vehicle occupancy
Basin	South Coast Air Basin
BAU	business as usual
BMP	Best Management Practice
BTEX	benzene, toluene, ethylbenzene, and xylene
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CH4	Methane
CHAS	Comprehensive Housing Affordability Study
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level
CO	carbon monoxide
CO2	carbon dioxide
CO2e	carbon dioxide equivalent
CPA	Community Plan Area
CPTED	Crime Prevention through Environmental Design
CSU	California State University
CSUCLA	California State University Los Angeles
CUSCLB	California State University Long Beach
CWC	California Water Code
dB	decibel
dBA	A-weighted decibel scale
DOT	Department of Transportation
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
FED	Functional Equivalent Document
FEMA	Federal Emergency Management Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute

GPR	ground penetrating radar
HFC	hydrofluorocarbons
HREC	historically recognized condition
HTP	Hyperion Treatment Plant
HUD	Housing and Urban Development
HVAC	Heating, Ventilation and Air Conditioning
I-10	Santa Monica Freeway
I-110	Harbor/Pasadena Freeway
ITE	Institute of Transportation Engineers
km	kilometers
LAAFP	Los Angeles Aqueduct Filtration Plant
LACC	Los Angeles County Code
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Bureau of Sanitation
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
lb./day	pounds per day
Leq	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
MMTCO2e	million metric tons carbon dioxide equivalent
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MTA	Metropolitan Transportation Authority
N2O	nitrous oxide
ND	Negative Declaration
NO2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
PFC	perfluorocarbons
PM	particulate matter
PM10	respirable particulate matter
PM2.5	fine particulate matter
ppm	parts per million
PPV	peak particle velocity

PVC	polyvinyl chloride
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RD	Reporting District
RPS	renewable portfolio standard
RMS	root mean square
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAR	Sewer Capacity Availability Request
SCCIC	South Center Coastal Information Center
SCS	Sustainable Communities Strategy
sq. ft.	square feet
SF6	sulfur hexafluoride
SGF	Sewer Generation Factor
SO2	sulfur dioxide
SOx	sulfur oxides
SOPA	Society of Professional Archeologists
SR	State Route
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Coefficient
SUSMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TIA	Traffic Impact Assessment
UCLA	University of California Los Angeles
USC	University of Southern California
USEPA/ U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VdB	vibration decibel
VHFHSZ	Very High Fire Hazard Severity Zone
VOC	Volatile Organic Compound
WSA	Water Supply Assessment
ZIMAS	Zoning Information and Map Access System

1.0 PROJECT INFORMATION

Project Title: Highland Park Townhome Project

Project Location: 5101 to 5123 E. Echo Street

Project Applicant Williams Homes
C/O Carl Steinberg
21080 Centre Pointe Parkway
Santa Clarita, CA 91350

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

PROJECT SUMMARY

The subject of this Initial Study Analysis is the Highland Park Townhome Project (Proposed Project). The Proposed Project is a residential development project on an approximately 0.89-acre (approximately 39,108 square-foot) site located) located at 5101 to 5123 E. Echo Street, Los Angeles California (Project Site) The Project Site is located in the Highland Park Neighborhood of Los Angeles within the Highland Park-Garvanza Historic Preservation Overlay Zone (HPOZ), within the Avenue 57 Transit Oriented District (TOD) Neighborhood Specific Plan ("Avenue 57 TOD Specific Plan"), which in turn is located within the boundaries of the Northeast Los Angeles Community Plan Area ("Community Plan").

The Project Site is currently improved as a paved parking area and would include the removal of the existing vacant paved lot, a small lot subdivision which would consist of 24 single family home lots and the construction of a fourplex with 3-story townhome style structures. A total of 6 structures would be constructed, with each structure containing 4 town homes (small lot subdivision lots) a piece. Each structure would be separated by 1" to 6" of air space (to be determined by a structural engineer). Each structure would have a maximum height of approximately 39.25 feet to the top of the stair roof access. Parking spaces would be provided within two-car garages located on the ground floor of each 3-story townhome style structure. The Project Site is located within the Avenue 57 TOD Specific Plan, Subarea 2, and is currently zoned the [Q]C4-2D-HPOZ (Historic Preservation Overlay Zone). The Project Applicant would request approvals and permits from the Department of Building and Safety (and other municipal agencies) for construction activities including, but not limited to, site clearing, excavation, shoring, grading, foundation, and construction of the new residential buildings.

ORGANIZATION OF INITIAL STUDY ANALYSIS

This Initial Study is organized into six sections as follows:

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

Section 2.0, Existing Conditions, describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.

Section 3.0, Project Description, provides a detailed description of the Proposed Project including the environmental setting, project characteristics, related project information, project objectives, and environmental clearance requirements.

Section 4.0, Environmental Analysis, this section includes an analysis for reach resource topic and identifies impacts of implementing the Proposed Project. It also identifies mitigation measures, if applicable.

Section 5.0, References, identifies all printed references and individuals cited in this Initial Study.

Section 6.0, List of Preparers, identifies the individuals who prepared this report and their areas of technical specialty.

Appendices present data supporting the analysis or contents of this Initial Study.

- Appendix A, Air Quality and Greenhouse Gas Background and Modeling Data
- Appendix B, Tree Survey Report
- Appendix C, Geotechnical Report
- Appendix D, Phase I Environmental Site Assessment
- Appendix E, Trip Generation Assessment

This Initial Study is a preliminary analysis prepared by and for the City of Los Angeles as the Lead Agency to determine whether an Environmental Impact Report (EIR) or a Negative Declaration (ND) or Mitigated Negative Declaration (MND) must be prepared for a Proposed Project. An MND is prepared for a project when the Initial Study has identified potentially significant effects on the environment but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no

substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

Implementation of the Proposed Project could cause some potentially significant impacts on the environment, but as shown in the environmental analysis contained in this Initial Study, all of the Proposed Project's potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that a MND shall be prepared for the Proposed Project.

2.0 EXISTING CONDITIONS

PROJECT LOCATION

The Proposed Project is located within Subarea 2 of the Avenue 57 TOD Neighborhood Specific Plan Area within the boundaries of the Northeast Los Angeles Community Plan. The Avenue 57 TOD Neighborhood Specific Plan Area is generally bound by Ash Street, Avenue 61, Hayes Avenue, Avenue 57, Media Drive, Long Fellow Street, and Avenue 50. The location of the Project Site is shown in **Figure 2.0-1, Project Location Map**.

The Project Site includes approximately 39,108 square feet of lot area (0.89 acres), and surrounding uses include commercial uses to the north, single- and multifamily residential uses to the east and west, and Echo Street to the south. The current addresses for the Project Site, Assessor's Parcel Numbers (APNs), and lot areas are summarized in **Table 2.0-1, Project Site Summary.**

Table 2.0-1
Project Site Summary

Property Address	APNs	Lot Area (sq. ft.)[a]
5101, 5107 E. Echo Street	5468005040	11,649
5111, 5113, 5115 E. Echo Street	5468005039	13,237
5117, 5119, 5121, 5123 E. Echo Street	5468005038	14,222
Total Site Area		39,108 sq. ft.

Source: City of Los Angeles, Department of City Planning. Zoning Information and Map Access System (ZIMAS) Database, Web GIS (2015). zimas.lacity.org.
Note: sq. ft. = square feet.
[a] *Due to rounding and slight measurement differences, the lot area according to ZIMAS does not exactly match the lot area per architectural plans.*

REGIONAL AND LOCAL ACCESS

Regional Access

Primary regional access to the Project Site is provided by the Harbor/Pasadena Freeway (Interstate [I]-110/State Route [SR] 110). Regional access is also provided by the Los Angeles County Metropolitan Transit Authority (Metro) Gold Line. The Harbor/Pasadena Freeway runs in a north–south direction east of the Project Site. In addition, the Glendale Freeway (SR 2) is located to the north; the Hollywood (US 101) and Golden State (I-5) Freeways are located to the west; the Ventura Freeway (SR 134) is located to the northeast; and the Santa Monica Freeway (I-10) is located to the south.

Local Street Access

Local street access is provided by a grid roadway system surrounding the Project Site and surrounding area. Echo Street is a designated collector street, which borders the Project Site to the south, is a two-way street that travels in the east–west direction. Figueroa Street, located north of the site, is two-way street that travels in the east–west direction providing four travel lanes. It is classified as a Major Highway Class II. Avenue 52, which is located southeast of the site, is classified as Secondary Highway that travels in the north–south direction and provides two travel lanes.

Public Transit

The Project Site is also located at the hub of the regional transit system in the Los Angeles area. The Project area is currently served by both local and intercity transit operators. The Los Angeles County Metropolitan Transportation Authority (MTA) operates one rail line in the Project area. MTA Bus Line 81 runs east along North Figueroa Street. The DASH Highland Park travels along North Figueroa Street near the Project Site. The Metro Gold Line Highland Park Station is located within 0.60 miles of the Project Site, at Avenue 58 and North Marmion Way.

LAND USE AND ZONING DESIGNATIONS

The Project Site is located within the Northeast Los Angeles Community Plan area of the City of Los Angeles. The Project Site is also located within several planning policy areas that have been adopted for the purposes of providing specific development standards that are appropriate for the project area,

Northeast Los Angeles Community Plan

The Project Site is located within the Northeast Los Angeles Community Plan Area of the City of Los Angeles. More specifically, the Project Site is located within the Avenue 57 Transit Oriented District (TOD) of the Northeast Los Angeles Community Plan area, which aims to preserve and enhance the positive characteristics of residential neighborhoods while providing a variety of compatible new housing opportunities.[1] The Community Plan notes that Highland Park is a historic community with rich cultural heritage.[2] The Northeast Los Angeles Community Plan designates the Project Site as Neighborhood Commercial.

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1 City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan* (1999), http://cityplanning.lacity.org/complan/pdf/nlacptxt.pdf.

2 City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan* (1999).

Avenue 57 TOD Neighborhood Specific Plan

The Project Site is located within the western portion of the Avenue 57 TOD Neighborhood Specific Plan ("Specific Plan"). The Specific Plan was adopted to implement the goals of the Northeast Los Angeles Community Plan, as well as the General Plan Framework and the Transportation Elements.[3] The Project Site is located within Subarea 2: Secondary Activity Center. The Specific Plan allows a broad mix of uses in this subarea and includes a variety of development incentives available for projects in this subarea.

Highland Park Garvanza Historic Preservation Overlay Zone

The Project Site is located within an adopted Historic Preservation Overlay Zone (HPOZ). The Highland Park Garvanza HPOZ is the largest within the City and encompasses approximately 4,000 structures (including over fifty Los Angeles City Historic-Cultural Monuments) and was the first HPOZ to inclide commercial buildigs. The architecture of Highland Park-Garvanza encompasses nearly every popular style from the 1880s through the 1940s.

Los Angeles Municipal Code

Consistent with the Northeast Los Angeles Community Plan, the Project Site is designated as Neighborhood Commercial and zoned [Q] C4-2D-HPOZ.[4] The C4 Limited Commercial zone permits commercial uses and R4 uses. The R4 residential zone permits group dwellings, multiple dwellings, schools, museums, and libraries. As the Project Site is within the Avenue 57 Specific Plan Area, building heights are limited to a maximum of 45 feet. The "2D" limitation restricts the floor area to a maximum of 3 times the buildable area of the lot (pursuant to Ordinance No. 164,307) The Avenue 57 Specific Plan further restricts residential development within the area to 1.5 to maintain consistency with the adopted Northeast Los Angeles Community Plan. As the Project Site falls within the HPOZ, all new construction, addition, exterior alteration, demolition, relocation or removal of any structure, natural feature, landscaping must obtain a written approval or permit signoff for proposed work from the Department of City Planning (ZI No. 2440).

EXISTING CONDITIONS

As shown in **Figure 2.0-2, Aerial Photograph of the Project Site**, the Project Site consists of a vacant paved lot. Vehicular access to the lot is provided through a driveway at Echo Street (currently gated

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3 City of Los Angeles Department of City Planning, *Avenue 57 Transit Oriented District*, Section 2(a), Purposes (2002), http://cityplanning.lacity.org/complan/specplan/pdf/AVE57TOD.PDF.

4 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org.

because the site is unoccupied). The Project Site contains minimal vegetation along the southern boundary of the Project Site and 11 on-site trees.

The Project Site is located within a Highland Park Garvanza Historic Preservation Overlay Zone. The site is not located within a Very High Fire Hazard Severity zone, Flood Zone, Alquist-Priolo Fault Zone, landslide zone, or liquefaction zone.

SURROUNDING LAND USES

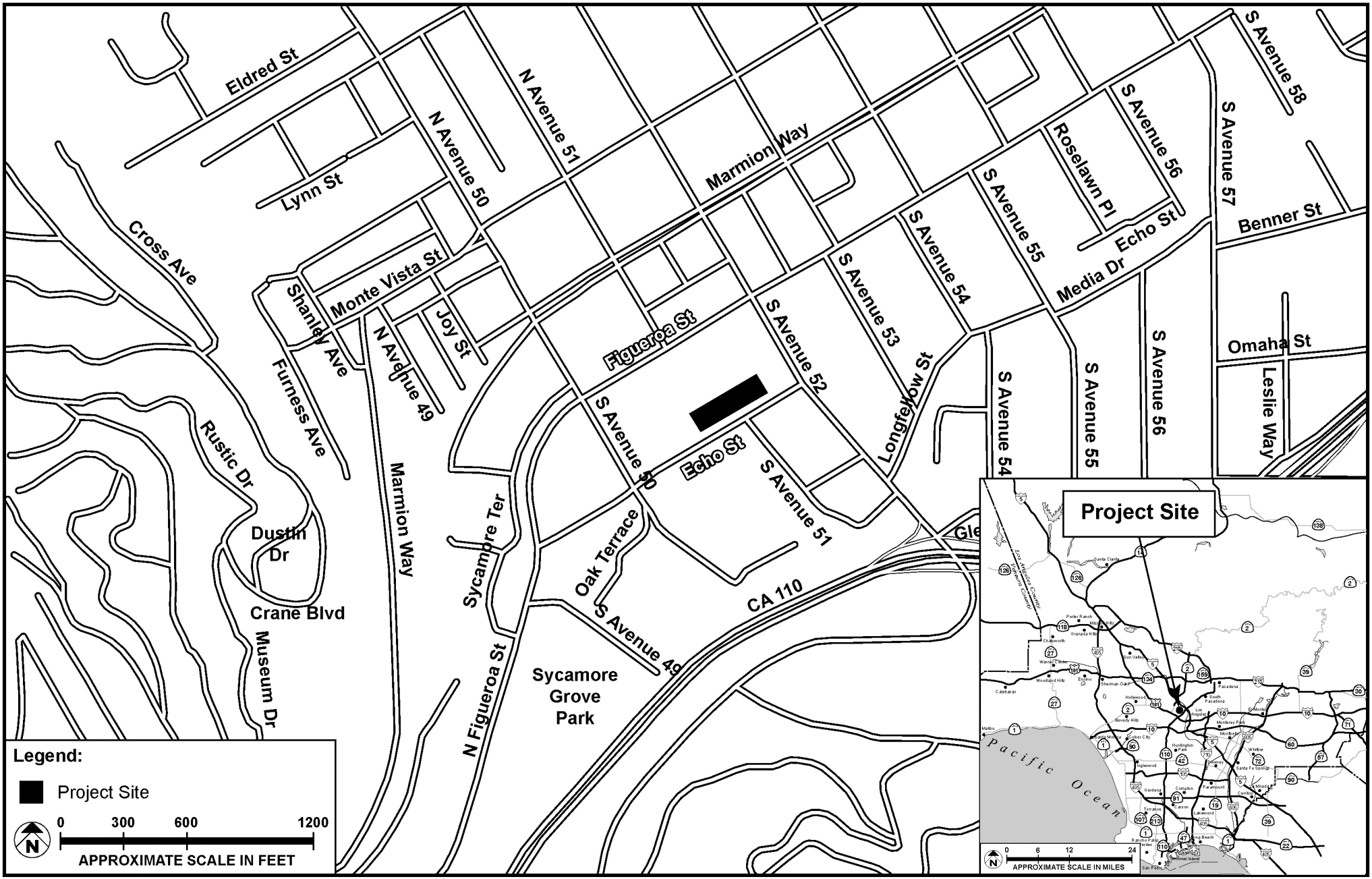
The properties surrounding the Project Site include 1- to 2-story residences, surface parking lots, and commercial buildings. **Figure 2-0-3, Land Use and Zoning Map,** depicts the Land Use and Zoning Designation of the Project Site and the surrounding buildings.

South: The Project Site is bounded by Echo Street. Across Echo Street are single-family residences. Properties to the south are zoned RD1.5-1-HPOZ and designated Low Medium II Residential.

North: A 1-story commercial building is located directly north of the Project Site. The building is currently occupied by a grocery store. Properties to the north are zoned [Q]C4-2D-HPOZ and designated Neighborhood Commercial.

West: Located west of the Project Site are single-family residences. Properties to the west are zoned Properties to the west are zoned R3-1-HPOZ and designated Medium Residential.

East: Located immediately east of the Project Site is a 2-story apartment building. Properties to the east are zoned RD2-1-HPOZ and designated Low Medium II Residential.



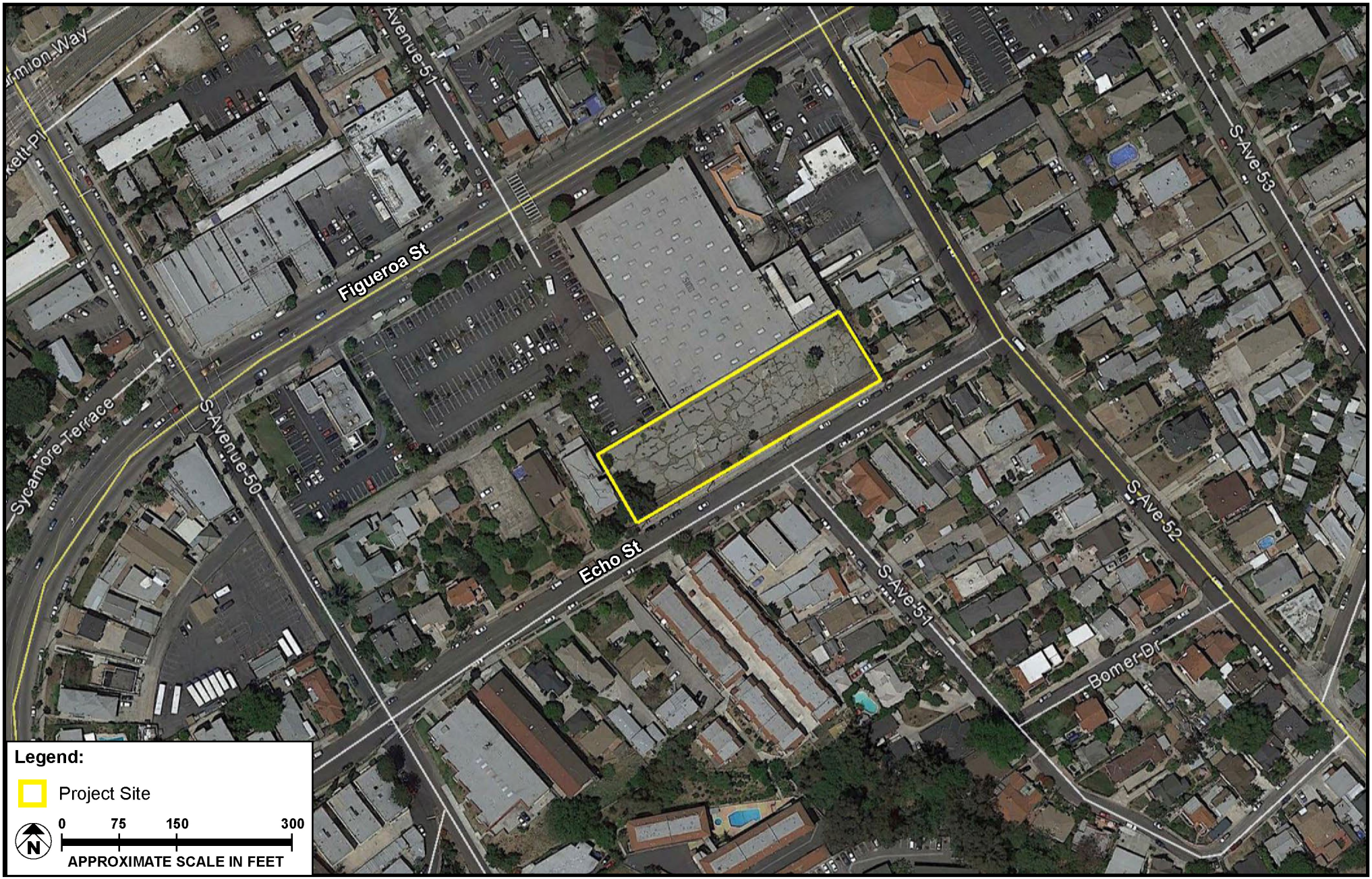
SOURCE: ARC GIS - 2011; Meridian Consultants - 2015

FIGURE **2.0-1**

Meridian Consultants

Project Location Map

082-001-15



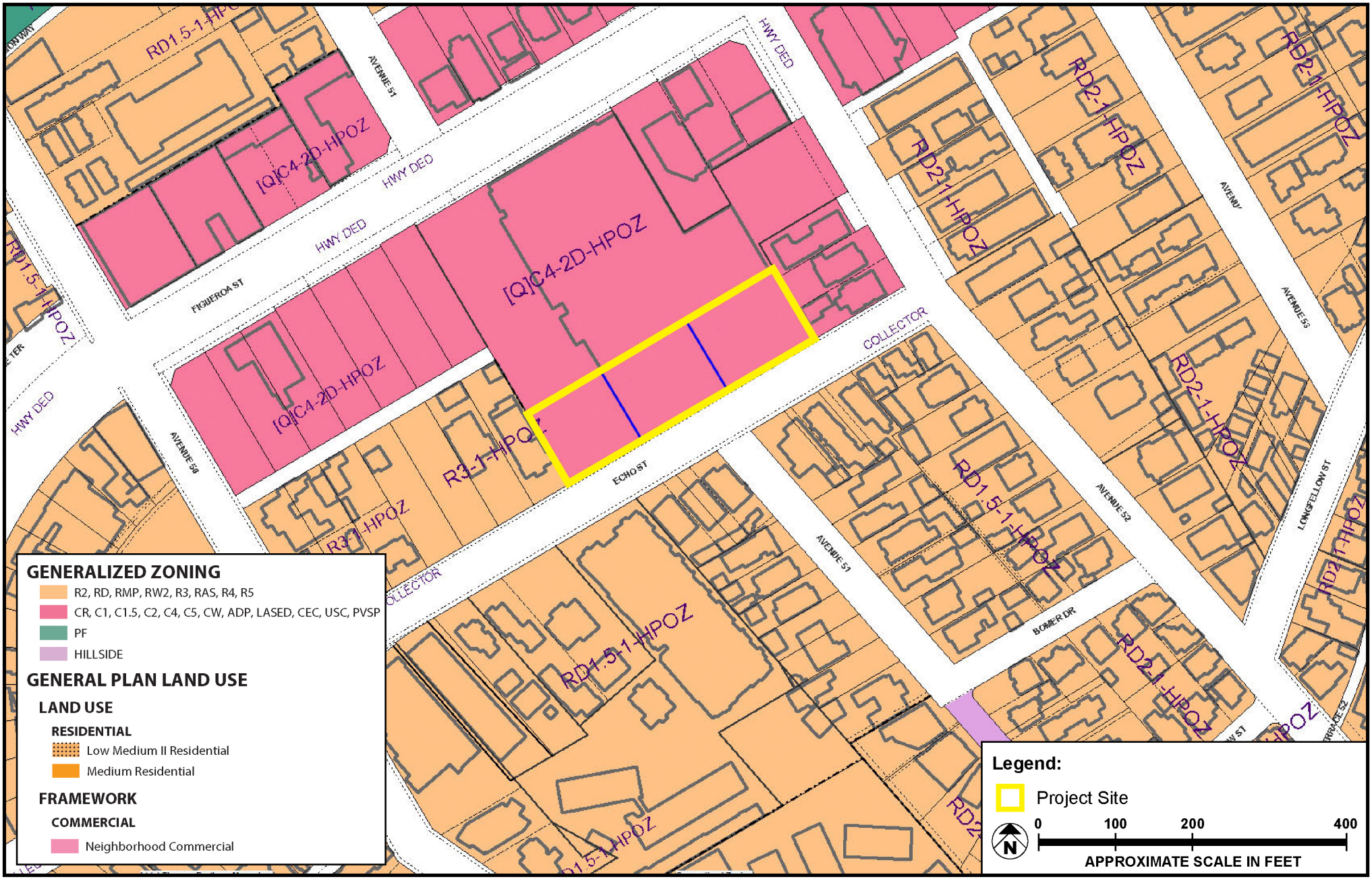
SOURCE: Google Earth - 2015

FIGURE **2.0-2**

Meridian Consultants

Aerial Photograph of the Project Site

082-001-15



SOURCE: City of Los Angeles, Zone Information and Map Access System (ZIMAS) - 2015

FIGURE **2.0-3**

Meridian Consultants

Land Use and Zoning Map

082-001-15

3.0 PROJECT DESCRIPTION

PROPOSED DEVELOPMENT

As shown on **Figure 3.0-1, Aerial Site Plan.** The Proposed Project would include the removal of the existing vacant paved lot, a small lot subdivision which would consist of 24 single family home lots and the construction of a fourplex 3-story townhome style structures. As shown on **Figure 3.0-1,** A total of 6 structures would be constructed, with each structure containing 4 town homes (small lot subdivision lots) a piece. Each structure would separated by 1" to 6" of air space (to be determined by a structural engineer). The ground floor of each unit would provide a two-car parking garage.

The townhome style structures would be approximately 39.25 feet to the top of the stair roof access. The site plan for the Proposed Project is shown in **Figure 3.0-1, Conceptual Site Plan**. Parking is provided in parking garages located on the first floor of each unit, and bedrooms are located on the first and third floors, and other amenities are located on each of the three floors as shown in **Figure 3.0-2, First and Second Floor Plans; 3.0-3, Third Floor and Roof Plans; Figure 3.0-4, Townhome 1 Plan;** and **Figure 3.0-5, Townhome 2 Plan.**

Building elevations depicting the scale and massing of the proposed structure are shown in **Figure 3.0-6, Exterior Elevations; Figure 3.0-7, Front Elevation;** and **Figure 3.0-8, Exterior Elevation—Echo Street**.

FLOOR AREA

The zoning designation for the Project Site is [Q]C4-2D-HPOZ. As discussed before, Height District No. 2 permits a FAR of 3 times the buildable area of the lot. The maximum permitted floor area of the Project Site is also restricted by the "D" limitation, which restricts the FAR to 3 times the buildable area of the lot. The Avenue 57 Specific Plan further restricts residential development within the area to 1.5 to maintain consistency with the adopted Northeast Los Angeles Community Plan. The Project Site would have a total floor area of 50,173 square feet and a total lot area of 39,108 square feet for a total proposed FAR of 1.3 to 1. As such, the total proposed FAR for the Proposed Project would comply with Northeast Los Angeles Community Plan, Avenue 57 Specific Plan and Los Angeles Municipal Code (LAMC) requirements.

PARKING AND ACCESS

Vehicular access to the Proposed Project would be provided with three driveways along E. Echo Street. As indicated above, parking (48 spaces) would be provided in two-car garages located at the ground floor of each townhome style units, along with 4 at-grade guest parking spaces, for a total of 52 parking

spaces to serve residents. The Proposed Project would also provide 8 bicycle spaces. Vehicle and bicycle parking would satisfy the requirements of the LAMC.

The parking requirements of the Proposed Project were determined by applying the appropriate parking ratios from the LAMC, Section 12.21.A.4.[5] The Proposed Project applied the following parking rates:

- Residential: 2.16 spaces per dwelling unit with more than 3 habitable rooms

As shown in **Table 3.0-1, Code Parking Requirements,** the Proposed Project requires a total of 52 parking spaces. As previously mentioned, the Proposed Project would provide 52 parking spaces and would meet the LAMC requirements for on-site parking supply.

Table 3.0-1
Code Parking Requirements

Land Use	Units	Code Requirement	Parking Required
Residential/Townhouse	24 du	2.16 sp/1 du	52 sp
Total Required			***52 sp***

Source: As required for the Downtown Business District by Section 12.21.A4 of the City of Los Angeles Municipal Code.
Note: sq. ft. = square feet.

CONSTRUCTION

Construction Schedule/Phasing

Construction of the Proposed Project is anticipated to take approximately 10 months, and be completed by 2017. Construction activities associated with the Proposed Project would be undertaken in three primary phases: (1) site clearing, (2) site preparation, and (3) building construction. The building construction phase includes the construction of the proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping the Project Site. A breakdown of the construction phases, timelines, and anticipated equipment is provided in **Table 3.0-2, Project Construction Phasing and Equipment.**

5 City of Los Angeles Department of City Planning, LAMC, Parking Requirements, sec. 12.21 A.4.

Table 3.0-2
Project Construction Phasing and Equipment

Construction Phase	Approximate Duration	Example of Equipment
Site clearing	1 month	Excavators, dump trucks, loaders, auger drills
Site preparation/Excavation	3 months	Excavators, dump trucks, loaders, pile drivers
Building construction	6 months	Excavators, dump trucks, fork lifts

Source: AECOM (2014).

Demolition/Site Clearing Phase

No structures are located on the Project Site; thus, no demolition activities are required. Site clearing would occur over approximately 1 month and would include the removal of asphalt surfaces from the site.

Site Preparation and Excavation Phase

After the completion of site clearing, an excavation phase for the Proposed Project would occur for approximately 3 months and would involve the shoring and excavation of land to ensure the proper base and slope for the building foundations. The Proposed Project would require minor grading and 500 cubic yards (cy) of cut, and result in the fill of 500 cy of soil on the Project Site, so there would be no soil exported off site.

Building Construction Phase

The building construction phase consists of above-grade structures and is expected to occur over approximately 6 months. Upon completion of the structures, architectural coating, finishing, and paving would occur. It is estimated that architectural coatings would occur over the final 2 months of the building construction phase, and paving would occur during the final month of construction.

Street Closures

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the 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. Construction equipment would be staged on site for the duration of construction activities. Traffic lane and right-of-way closures, if required, will be properly permitted by the City agencies and will conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 AM to 7:00 PM Monday through Friday, and between 8:00 AM and 4:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Haul Routes

All construction and demolition debris would be recycled to the maximum extent feasible. Demolition debris from the site that cannot be recycled or diverted would be hauled to the Chiquita Canyon or the Manning Pit landfills, which accept construction and demolition debris and inert waste from areas within the City of Los Angeles. The Chiquita Canyon landfill is approximately 34 miles north of the Project Site (approximately 68 miles round-trip). The Manning Pit landfill is approximately 15.5 miles east of the Project Site (approximately 31 miles round-trip). For recycling efforts, the Central Los Angeles Recycling Center and Transfer Station (Browning Ferris Industries) accepts construction waste for recycling and is located approximately 6 miles from the Project Site (approximately 12 miles round-trip).

For purposes of analyzing the construction-related impacts, it is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks and/or trucks with tandem trailers. All truck staging would occur either on site or at designated off-site locations and radioed into the site to be filled. The local haul route for the Project Site toward the SR-110 would utilize Avenue 52.

REQUESTED APPROVALS

The Applicant requests approval of the following:

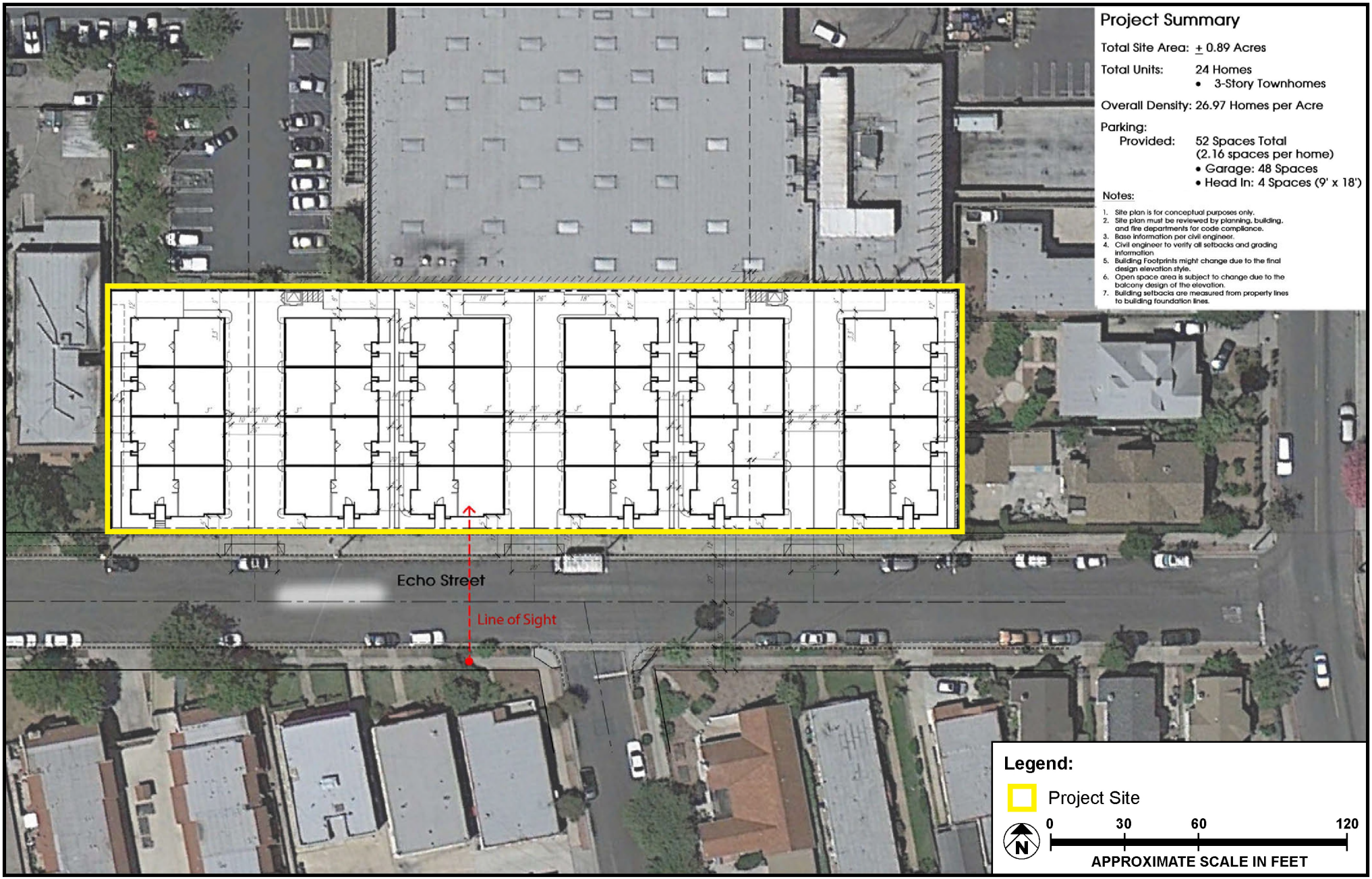
Vesting Tentative Tract Map: Approval of Vesting Tentative Tract Map No. 73320 for the creation of residential townhome style units.

Zone Change: Zone change from [Q]C4-2D-HPOZ, Limited Commercial Zone (C4) in Height District 2 (2D) within a Historic Preservation Overlay Zone (HPOZ), to [T][Q]-RD1.5-2D-HPOZ, Restricted Density Multiple Dwelling Zone (RD1.5) in Height District 2 (2D) within a Historic Preservation Overlay Zone (HPOZ).

Specific Plan Project Permit Compliance (SPP): Approval of Project Permit Compliance with the Avenue 57 TOD Neighborhood Plan pursuant to LAMC 11.5.7.C.

Certificate of Compatibility (CCMP): Approval of a CCMP for the Historic Preservation Overlay Zone (HPOZ) pursuant to LAMC Section 12.20.3.L.

Los Angeles Municipal Code (LAMC) Section 11.5.7.H: Director's interpretation for the assembly of lots within the Specific Plan.



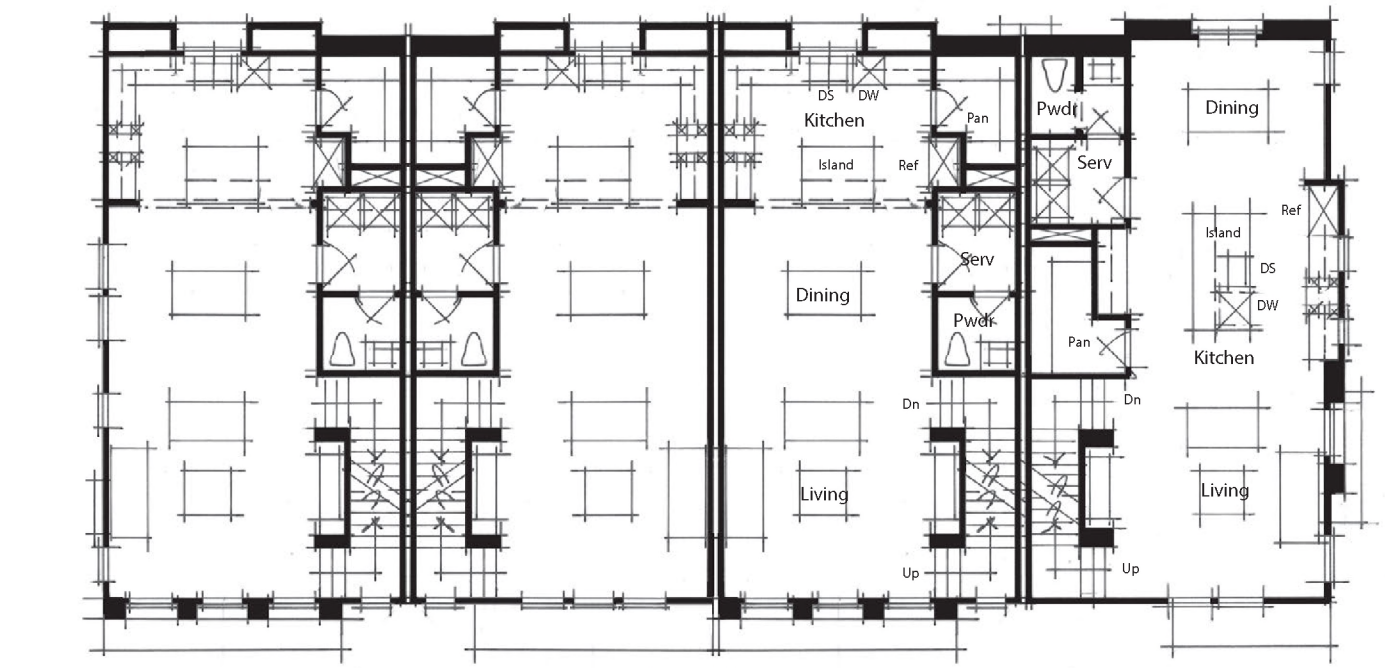
SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-1**

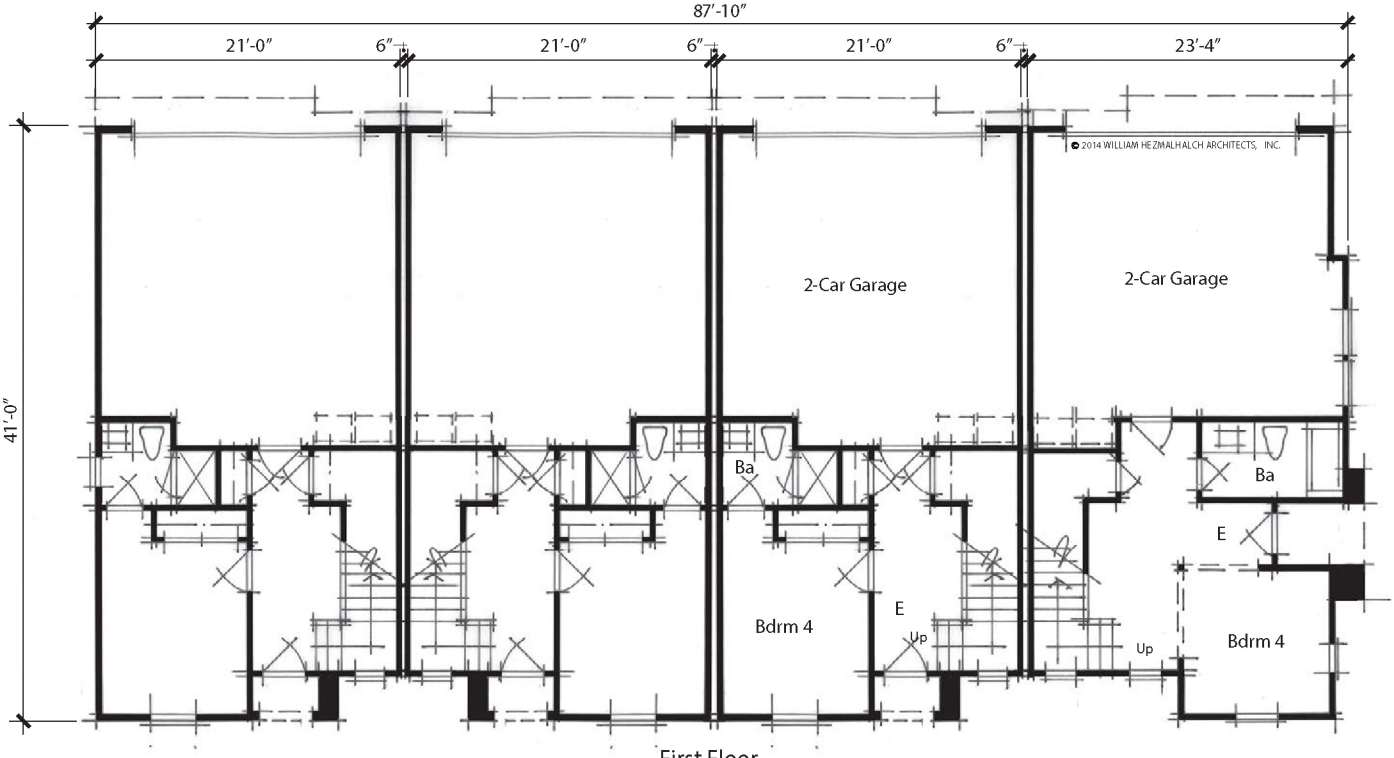
Meridian Consultants

Conceptual Site Plan

082-001-15



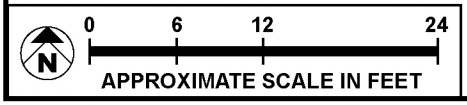
Second Floor



First Floor

Plan 1 | Plan 1 | Plan 1 | Plan 2

4-Plex Townhome Composite Floor Plans



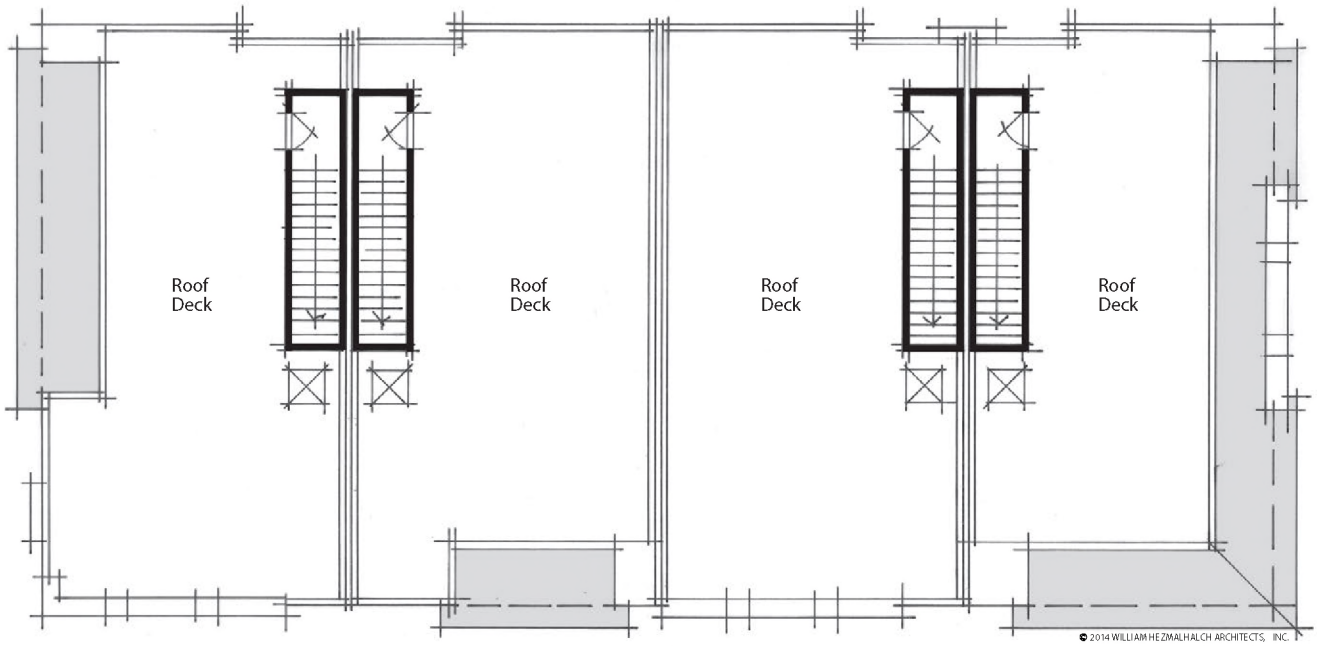
SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-2**

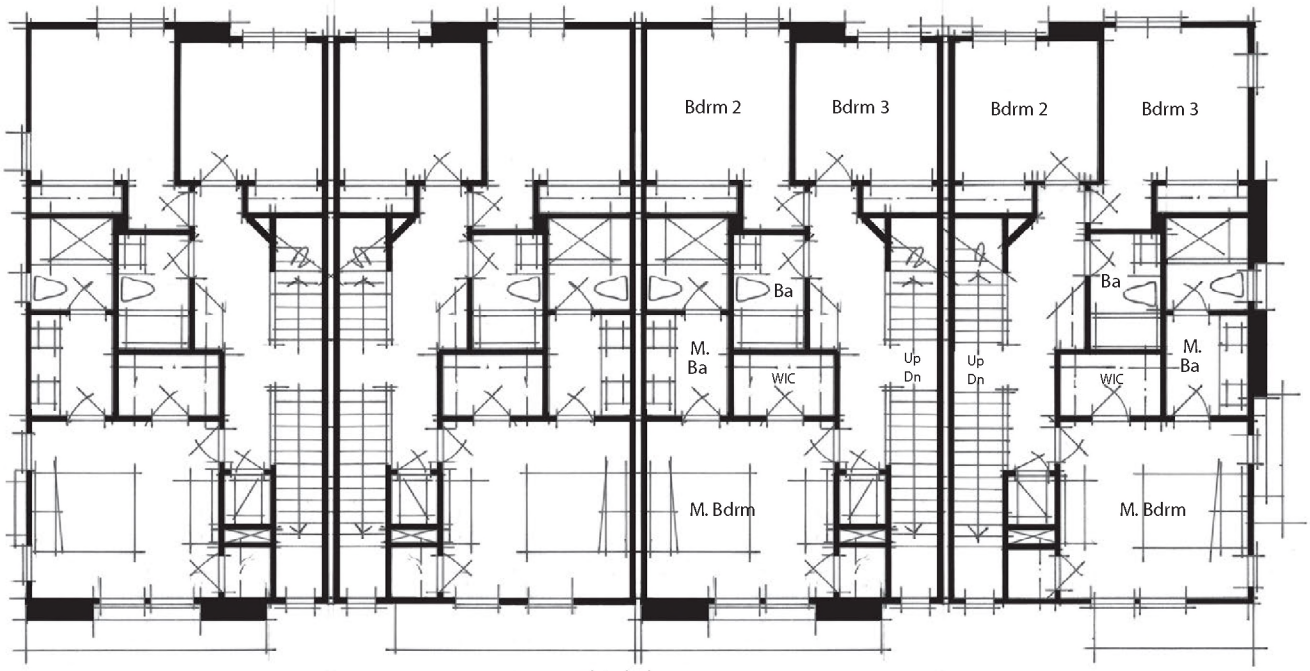
Meridian Consultants

First and Second Floor Plans

082-001-15

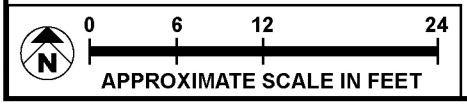


Roof Plan



Plan 1 Plan 1 Third Floor Plan 1 Plan 2

4-Plex Townhome Composite Floor Plans / Roof Plan



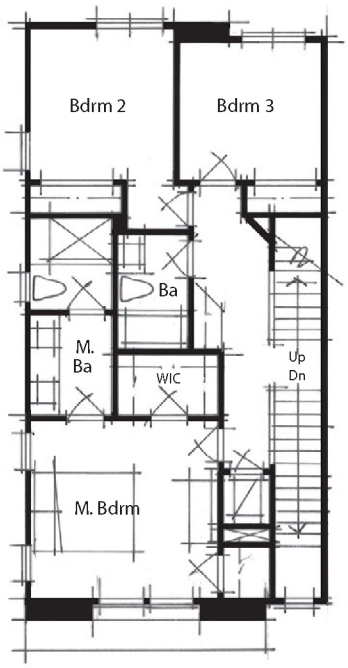
SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-3**

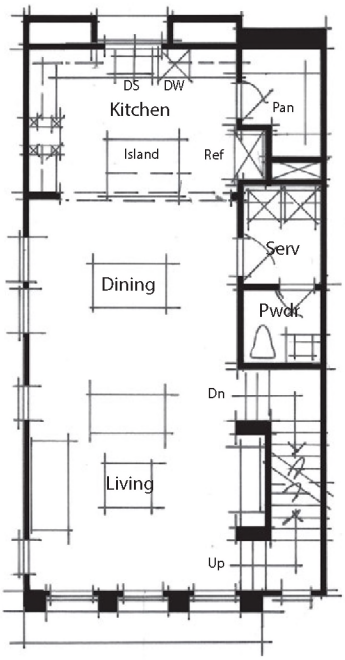
Meridian Consultants

Third Floor Plan and Roof Plan

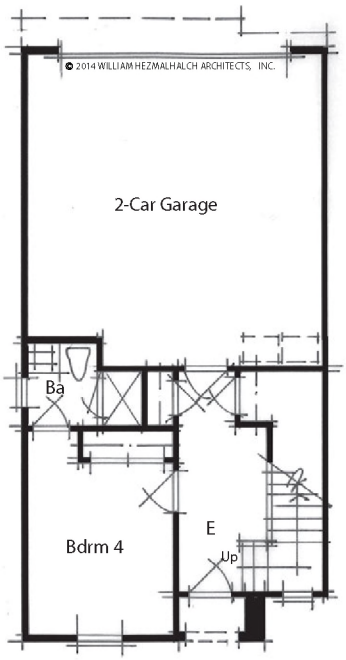
082-001-15



Third Floor



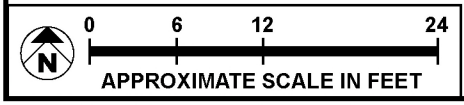
Second Floor



First Floor

1,956 S.F.
4 Bdrm / 3.5 Bath
2-Car Garage

4-Plex Townhome Plan 1 Floor Plan



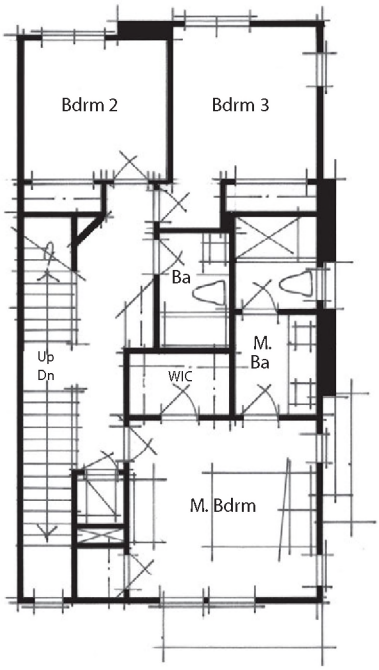
SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-4**

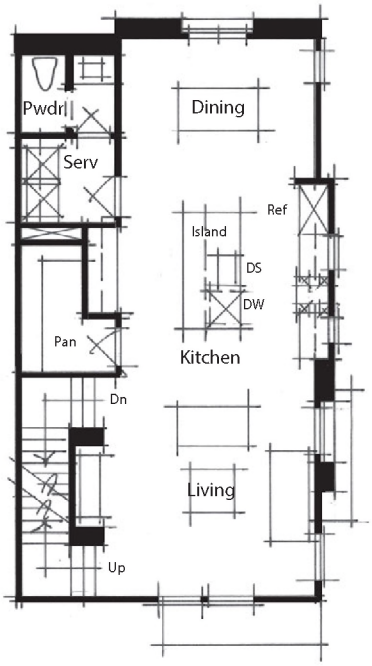
Meridian Consultants

Townhome Plan 1 Floor Plan

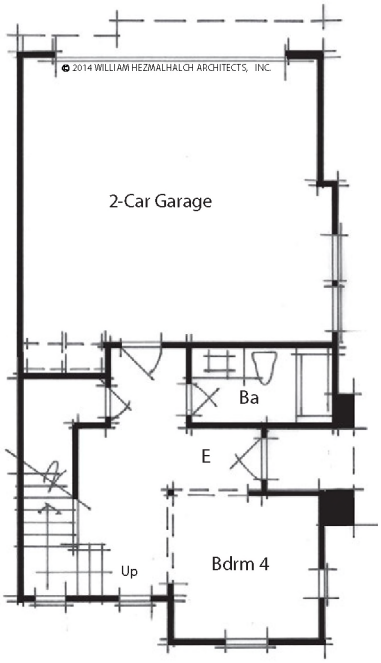
082-001-15



Third Floor



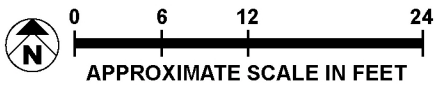
Second Floor



First Floor

1,989 S.F.
4 Bdrm / 3.5 Bath
2-Car Garage

4-Plex Townhome Plan 2 Floor Plan



SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-5**

Meridian Consultants

Townhome Plan 2 Floor Plan

082-001-15

Right (Facing Echo Street)

Rear

Left

Front

4-Plex Townhome Exterior Elevations

SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-6**

Meridian Consultants

Exterior Elevations

082-001-15

4-Plex Townhome Front Elevation

SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-7**

Meridian Consultants

Front Elevation

082-001-15

4-Plex Townhome Exterior Elevations - Echo Street View

SOURCE: William Hezmalhalch Architects Inc. - February 2015

FIGURE **3.0-8**

Meridian Consultants

Exterior Elevation - Echo Street

082-001-15

4.0 ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (California Code of Regulations, Title 14, Chapter 3, 15000-15387). The thresholds of significance are based on the Los Angeles (L.A.) CEQA Thresholds Guide.[6]

6 City of Los Angeles, L.A. CEQA Thresholds Guide (2006).

4.1 AESTHETICS

Impact Analysis

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

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

The Project Site is located within the Highland Park area of Los Angeles, less than 0.25 miles north of the SR-110 and approximately 2 miles south of the SR-2 and approximately 2.25 miles east of the I-5. When looking north and south, the view is generally urban in character, and defined by low-rise commercial and residential buildings. Similar views exist when looking to the east, and west. The SR-110, known as the Historic Arroyo Seco Byway, is as a National Scenic Byway.[7]

The Project Site is currently a vacant paved lot. There are no structures on the Project Site. However, the Project Site contains 11 on-site trees and minimal vegetation along the southern side. The Project Site is not located within or along a designated scenic corridor and no scenic views exist from or through the currently developed site. The Proposed Project would develop six 3-story, residential townhome style buildings. The Proposed Project would alter the existing views and character of the Project Site and immediately surrounding area in a manner that is compatible with the urban form of Los Angeles and the Historic Highland Park. The Proposed Project would be visually compatible with the surrounding neighborhood, and is consistent with several other residential and commercial developments in the Highland Park area.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

7 California Department of Transportation (Caltrans), District 7, "District 7 Projects" (2007), http://www.dot.ca.gov/dist07/travel/projects/details.php?id=6.

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if scenic resources would be damaged and/or removed by development of a project. The Project Site is currently a vacant paved lot. There are no structures on the Project Site; however, the Project Site contains 11 on-site trees, as well as minimal vegetation on the southern portion of the site. The Project Site is not bordered by or within the viewshed of a designated scenic highway. There are two coast live oak trees, which have protected status, located on site. As such, they would be considered natural scenic resources because they are as native California trees. Impacts to native California trees are discussed further in **Section 4.4, Biological Resources**. With implementation of mitigation measure **IV-70**, stated in **Section 4.4**, impacts to these native trees would be less than significant. There are no unique geologic features on the Project Site. Because no structures exist on the Project Site, no on-site historic structures would be impacted by the Proposed Project. The nearest historic resource is the Kelman Residence and Carriage Barn located nearby at 5029 Echo Street. The Project Site is located approximately 250 feet from this historic resource and would not be impacted by the construction or operation of the Proposed Project.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant would occur if the Proposed Project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

Building Heights and Massing

With respect to building mass and height, land uses within the Project vicinity vary in use and height. Within the Highland Park area, there are commercial retail, office, restaurant, parking, and residential land uses ranging in various heights. The Avenue 57 Specific Plan limits the structure height to 45 ft. The Project Site would be approximately 39.25 feet above grade to the top of the roof. Therefore, the massing and height of the proposed buildings would be consistent with the height of several buildings within the immediate vicinity of the Project Site the impact of the Proposed Project with respect to building height and massing would be less than significant.

Views

The Proposed Project would be 3-stories in height, and would not become a prominent part of the existing skyline. The Proposed Project would be visible from adjacent residences located immediately to the east, west, and south of the Project Site. The views of the mountains are currently obscured from the adjacent residences. Although the building is visible from private viewpoints within nearby residential and commercial buildings within the surrounding area, it should be noted that private views are not protected by any viewshed protection ordinance, and the alteration of private views would not constitute a significant impact. The visual impact of one building blocking another building is not considered a significant impact, as the general characteristics of the urban setting would not be altered. As such, the Proposed Project's impact on obstruction of scenic public views would be less than significant.

Landscape Plan

The Proposed Project would provide approximately 7,216 square feet of landscaping. The landscape plan would not result in impacts to the visual character and aesthetics of the neighborhood. Landscaping would be compatible with the surrounding area. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks would be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Architect and to the satisfaction of the decision maker. Impacts would be less than significant.

Vandalism

Environmental impacts may result from project implementation due to graffiti and accumulation of rubbish and debris along the wall adjacent to public right-of-way. However, every building, structure or portion thereof, would be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to *Municipal Code* Section 91.8104. As well as, maintaining that the exterior of all buildings and fences would be free from graffiti when such graffiti is visible from a street or alley, pursuant to *Municipal Code,* Section 91.9104.15. Impacts would be less than significant.

Shade and Shadow

Shade and shadow impacts may result if direct sunlight to the proposed buildings affects adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. Per the *L.A. CEQA Thresholds Guide*, "facilities and operations sensitive to the effects of shading include: routinely useable

outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort of commerce.

The structures would be 39.25 feet above grade to the top of the roof. Shadow-sensitive receptors typically include residences (particularly yards), recreational facilities and parks, schools, and/or outdoor seating areas. A shadow is dependent on the height, size, and shape of the building from which shadow is cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth and the earth's elliptical orbit. The longest shadows are cast during winter months and the shortest shadows are cast during the summer months. The closest shadow-sensitive uses located near the Project Site are the multifamily and single-family residential units located to the east, west, and south.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. A significant impact may occur if the Proposed Project introduces new sources of light or glare on or from the Project Site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Proposed Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of Proposed Project sources; and (b) the extent to which Proposed Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

Light

Night lighting for the Proposed Project would be provided to illuminate the building entrances and common open space areas, and largely to provide adequate night visibility for residents and visitors and to provide a measure of security. It should be noted that lights associated with the surface parking lots on the Project Site currently exist. The Proposed Project would include nighttime security lighting along the building's frontages on Echo Street. Due to its close proximity with surrounding residential buildings, the Proposed Project would utilize outdoor lighitng desinged and installed with shielding to reduce light-sourced impacts surrounding the Project Site, such as adjacent residential properties or the public right-of-way. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The townhome style buildings would be constructed of materials to minimize glare and reflected heat utilizing light-and cool-colored exterior wall materials balanced with low-reflective glass materials. Landscaping would consist of trees, ground cover, and shrubs to enhance the pedestrian environment. Highly polished materials or highly reflective metal material and glass that could reflect light and create glare are not proposed. The Proposed Project would not introduce any new sources of glare that are incompatible with the surrounding areas. Additionally, the architectural materials to be used for the exterior would be limited to materials that do not cause excessive glare and reflected heat. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact Analysis

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

No Impact. As shown on **Figure 2.0-2, Aerial Photograph of the Project Site**, the Project Site consists of a vacant paved lot and is surrounded by residential buildings, surface parking lots, and commercial buildings. The Project Site is located within a developed, urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on or near the Project Site. According to the California Department of Conservation "Los Angeles County Important Farmland 2010" map, the Project Site is not designated as farmland.[8] No portion of the Project Site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project 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 current zoning is [Q]C4-2D-HPOZ and has a land use designation of Neighborhood Commercial in the Northeast Los Angeles Community Plan. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[9]

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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8 California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Important Farmland Map, *Los Angeles County Important Farmland 2010* (January 2011), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.

9 California Department of Conservation, Division of Land Resource Protection, "The Land Conservation (Williamson) Act" (2013), http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx.

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

No Impact. The Project Site is zoned [Q]C4-2D-HPOZ and has a land use designation of Neighborhood Commercial in the Northeast Los Angeles Community Plan. The Project Site is not zoned as forestland or timberland, and there is no timberland production at the Project Site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project Site is occupied by surface parking lots. No forested lands or natural vegetation exists on or near the Project Site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

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.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.3. AIR QUALITY

Impact Analysis

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

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the AQMP, which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted by the Governing Board of the SCAQMD on June 1, 2012. The 2012 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, reduce the high levels of pollutants in the Basin, meet federal and State air quality standards, and minimize the fiscal impact that pollution control measures have on the local economy. It builds on approaches taken from the previous AQMP for the attainment of the federal ozone air quality standard. These planning efforts have substantially decreased the population's exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin.

Projects that are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) are considered consistent with the AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portions of the AQMP. As impacts with respect to population, housing and employment would be less than significant, the Proposed Project would not conflict with the AQMP.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. The Proposed Project would contribute to regional and localized air pollutant emissions during construction and Project operation. These emissions have the potential to exceed SCAQMD emissions thresholds.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 10 months. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in three main steps: (1) site clearing; (2) site preparation; and (3) building construction. The building construction phase includes the construction of proposed buildings, connection of utilities to the buildings, laying irrigation for landscaping, architectural coatings, paving, and landscaping to the Project Site.

The Proposed Project would contribute to regional and localized air pollutant emissions during construction (short-term) and Project occupancy (long-term). These construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during demolition/site clearing, site preparation/excavation would primarily generate PM10 and PM2.5 emissions. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project Site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings 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) recommended by the SCAQMD. **Table 4.3-1, Maximum Construction Emissions**, identifies daily emissions that are estimated to occur on peak construction days for each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 – Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove

bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas.

Table 4.3-1
Maximum Construction Emissions (pounds/day)

Source	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum	18.85	6.47	9.41	0.01	1.71	0.62
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to Modeling in **Appendix A**.*
Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403 and 403.1, including watering disturbed areas a minimum of 3 times per day, replacing ground covers, and utilizing Tier 3 equipment.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SOx = sulfur oxides.

As shown in **Table 4.3-1**, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significant threshold for criteria pollutants during the construction phases. Additionally, during Project construction, all unpaved construction areas would be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting would reduce fugitive dust by as much as 55 percent. The construction area would also be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind All clearing, earth moving, or excavation activities would be discontinued during period of high winds (i.e., greater than 15 mph), to prevent excessive amounts of dust. All dirt/soil materials transported off site would be either sufficiently watered or securely covered to prevent excessive amount of dust. Trucks having no current hauling activity shall not idle but be turned off.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Operational Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance. Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod recommended by the SCAQMD. The results of these calculations are presented in **Table 4.3-2, Maximum Operational Emissions**.

Table 4.3-2
Maximum Operational Emissions (pounds/day)

Source	VOC	NOx	CO	SOx	PM10	PM 2.5
Maximum	1.64	2.35	10.75	0.02	1.40	0.41
SCAQMD threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to Modeling in **Appendix C.***

As shown in **Table 4.3-2**, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. However, adverse impacts upon future occupants may result from project implementation because of existing diminished ambient air pollution levels in the project vicinity, and an air filtration system would be installed and maintained and would to reduce impacts to a less than significant level. Air filtration filters would meet or exceed the ASHRAE Standard 52.2 and Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?*

Less than Significant Impact. Based on the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the project would add a considerable cumulative contribution to federal or State nonattainment pollutants. As the Basin is currently in State nonattainment for ozone, nitrogen dioxide (NO2), PM10 and PM2.5, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. In regards to determining the significance of the Proposed Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development 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 should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions,

then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As discussed before, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. The Proposed Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Project construction activities and operations, as described above, may increase air emissions above current levels. Also, concentrations of pollutants may have the potential to impact nearby sensitive receptors. Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,[10] apply to projects that are less than or equal to 5 acres in size and are only applicable to the following criteria pollutants: NOx, CO, PM10, and PM2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each Source Receptor Area (SRA). For PM10, the LSTs were derived based on requirements in SCAQMD Rule 403—Fugitive Dust. For PM2.5, LSTs were derived based on a general ratio of PM2.5 to PM10 for both fugitive dust and combustion emissions.

10 South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology* (June 2003, Revised July 2008).

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are multifamily and single-family residential uses to the east, west, and south of the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs with receptors located within 25 meters (82.02 feet) have been used to address the potential localized air quality impacts associated with the construction-related NOx, CO, PM10, and PM2.5 emissions for each construction phase.

Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in **Table 4.3-3, Localized Significance Threshold (LST) Worst-Case Emissions (pounds/day)**, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for a 0.89 -acre site in SRA 1. Localized air quality impacts from construction activities to the off-site sensitive receptors would be less than significant.

Table 4.3-3
Localized Significance Threshold (LST) Worst-Case Emissions (pounds/day)

Source	NOx	CO	PM10	PM2.5
Construction				
Total mitigated maximum emissions	**6.47**	**9.41**	**1.71**	**0.62**
LST threshold	74	680	5	3
Threshold Exceeded?	**No**	**No**	**No**	**No**
Operational				
Area/energy emissions	**0.11**	**2.04**	**0.02**	**0.02**
LST threshold	74	680	2.0	1.0
Threshold Exceeded?	**No**	**No**	**No**	**No**

Note: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hotspot analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection rated D or worse where the project would

increase the V/C ratio by two percent or more. Based on a review of the Trip Generation Assessment, the Proposed Project would not meet these criteria for any of the studied intersections. The Proposed Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants (TAC)

As the Proposed Project consists of a residential development, the Proposed Project would not include any land uses that would involve the use, storage, or processing of carcinogenic or noncarcinogenic TACs and no toxic airborne emissions would typically result from Project implementation. In addition, construction activities associated with the Proposed Project would be typical of other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal levels that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of TACs would be less than significant.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Create objectionable odors affecting a substantial number of people?

Less than Significant Impact. A significant impact would occur if objectionable odors occur that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. As the Proposed Project involves no elements related to these types of activities, no odors are anticipated.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. Impacts may result from occupancy of the proposed residential units due to the location of trash receptacles near adjacent residences. Although these odors could be a source of nuisance, they are temporary and intermittent in nature. The trash receptacles will be covered and located in two trash enclosures, which would reduce the likelihood of odors.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.4 BIOLOGICAL RESOURCES

Impact Analysis

The following section summarizes and incorporates by reference information from the Williams Homes Echo Street Project Tree Survey Report dated January 28, 2014 (referred to hereafter as Tree Report) prepared by Wildscape Restoration.[11] The Tree Survey Report is included as **Appendix B** to this Initial Study.

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could 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.

The Project Site is currently a vacant paved lot with vegetation, on-site trees, and no structures located on site. The vegetation is light to moderately dense and consists of grasses, shrubs, and trees. The Project Site does not contain any critical habitat or support 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 (CDFW) or US Fish and Wildlife Service (USFWS). The Tree Survey determined that two coast live oak trees with protected status are located on site. Additionally, eight trees located on site are nonprotected but considered significant. Significance is defined as an 8-inch diameter at breast height. The eight significant, nonprotected trees include three crape myrtle (*Lagerstroemia indica*), four Mexican palm (*Washingtonia robusta*), and one tree of heaven (*Ailanthus altissima*). The final tree is a crape myrtle that is neither protected nor significant. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA) and the California Department of Fish and

11 Wildscape Restoration, Williams Homes Echo Street Project Tree Survey Report (January 28, 2015).

Game Code.[12,13] The Project Applicant shall comply with mitigation measure **IV-20** to ensure that no significant impacts to nesting birds would occur.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

IV-20 Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

Project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding season for birds, which generally runs from March 1 to August 31 (and 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 of kill (California Department of Fish and Game Code Section 86).

If Project activities cannot feasibly avoid the breeding season, beginning 30 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 properties adjacent to the Project Site, 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 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 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

12 *United States Code*, Title 33, Section 703 et seq., see also Title 50, *Code of Federal Regulations*, Part 10.
13 California Department of Fish and Game Code, Section 3503.

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 previously 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.

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

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could 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; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise and light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is occupied by a surface parking lot. No riparian or other sensitive natural community is located on or adjacent to the Project Site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project 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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is paved primarily covered with impermeable surfaces and does not

contain any wetlands or natural drainage channels. The Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Would the project 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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in the interference 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 Proposed Project vicinity.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact with Project Mitigation. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project-related, significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance.[14] As stated previously, 11 on-site trees within the Project Site (See **Appendix B**) may be removed during construction. Two of these 11 trees consist of a protected tree species, California live oak). Eight of the trees are considered nonprotected but significant, and one tree is neither protected nor significant. The removal and placement of these trees would be subject to the review and approval of the Board of Public Works, Urban Forestry Division. Thus, the Project Applicant would comply with mitigation measures **IV-70** and **IV-80** to ensure that no significant impacts to protected or significant trees would occur.

14 City of Los Angeles Department, *Los Angeles Tree Ordinance (No. 177404), LAMC,* sec. 12.21.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measures are proposed to reduce impacts to a less than significant level.

IV-70 Tree Removal (Locally Protected Species)

Environmental impacts may result due to the loss of protected trees on the site. However, these potential impacts will be mitigated to less than significant level by the following measures:

- All protected tree removals require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval (213-847-3077), prior to implementation of the Report's recommended measures.
- A minimum of two trees (a minimum of 48-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.
- Bonding (Tree Survival):

a. The applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision maker guaranteeing the survival of trees required to be maintained, replaced or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new oak tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's oak tree bond may be exonerated.

b. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the oak trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

IV-80 Tree Removal (Non-Protected Trees)

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multitrunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall conform to the current standards of the Department of Public Works, Urban Forestry Division, Bureau of Street Services.

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

No Impact. A significant impact would occur if the Proposed 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 impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.5 CULTURAL RESOURCES

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Proposed Project would disturb historic or prehistoric resources that presently exist within the Proposed Project Site. The Project Site is paved and is vacant of any structures, thus no on-site historic structures would be impacted by the redevelopment of the Project Site. As discussed previously under **Section 4.1, Aesthetics**, the nearest historic resource is the Kelman Residence and Carriage Barn located nearby at 5029 Echo Street. The historic resource is located approximately 250 feet from the Project Site, and would not be impacted by the construction or operation of the Proposed Project.

Impacts would not occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources that presently exist within the Project Site. The Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas. The Proposed Project would require excavation up to 5 feet as identified in the Geotechnical Report. Thus, the potential for the accidental discovery of archaeological materials is considered low. However, because the presence or absence of such materials cannot be determined until the site is excavated, no further evaluation of this issue is warranted at this time.

However, as a precautionary measure, the Department of City Planning recommends that if any archaeological materials are encountered during the course of Project development, all further development activity would halt and the services of an archaeologist would be secured. The archaeologist would assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The report would contain recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource and the Project Applicant would comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. Project development may resume once copies of the archaeological survey, study, or report are submitted to the South Central Coastal Information Center (SCCIC). The archaeologist's survey, study, or report would

be submitted prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit. If an archaelogist is needed the Applicant would contact the South Central Coastal Information Center (SCCIC) located at California State University (CSU) Fullerton, or a member of the Society of Professional Archaeologists (SOPA), or a SOPA-qualified archaeologist. Copies of the archaeological survey, study, or report would be submitted to the SCCIC Department of Anthropology.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features that presently exist within the Project Site. The Project Site has been previously graded and is currently improved with a paved lot. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. Although no paleontological resources are known to exist on site, there is a possibility that paleontological resources exist at subsurface levels; however, the Proposed Project would not require excavation beyond 5 feet as all construction would occur above-ground.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a Project-related, significant adverse effect could occur if grading or excavation activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site. However, it is possible that unknown human remains could occur on the Project Site, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur.

In the event that human remains are discovered during excavation activities, the following procedure would be observed; excavations would immediately stop and the County Coroner would be contacted. The Coroner has 2 working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. The Native American Heritage Commission would 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 descendent does not make recommendations within 48 hours the owner would reinter the remains in an area of the property secure from further disturbance, or; if the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

4.6 GEOLOGY AND SOILS

Impact Analysis

The following section summarizes and incorporates by reference information from the Preliminary Geotechnical Engineering Investigation, Proposed Three-Story Townhomes, PM 3298, Lot B, 5123 Echo Street, Los Angeles, California dated September 19, 2014 (referred to hereafter as Geotechnical Report), prepared by GeoConcepts Inc.[15] The Geotechnical Report is included as **Appendix C** to this Initial Study.

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? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if the Project Site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. Based on the information contained in the Geotechnical Report, while there are several active and potentially active faults that could possible affect the Project Site is not located within an earthquake-induced landslide hazard zone on the State of California Seismic Hazard Map. Additionally, the Project Site is not located within a liquefaction hazard zone on the State of California Seismic Hazard Zone map. The site is located within Seismic Zone 4, and is not located within an Alquist-Priolo Earthquake Fault Zone. No known active faults cross the Project Site, nor is it located in an established Alquist-Priolo (AP) Special Studies Zone based on the Geotechnical Report (see **Appendix C**). The potential risk for surface fault rupture through the Project Site is considered low.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Strong seismic ground shaking?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards

15 GeoConcepts Inc., Preliminary Geotechnical Engineering Investigation, Proposed Three-Story Townhomes, PM 3298, Lot B, 5123 Echo Street, Los Angeles, California (September 14, 2014).

that are greater than the average risk associated with other locations in Southern California. The Project Site is located within a seismically active region, as is all of Southern California. The intensity of ground shaking depends primarily on the earthquake's magnitude, the distance from the source, and the site response characteristics. Several active and potentially active faults could affect the Project Site. The Project Site is located within Seismic Zone 4, and all of Southern California is within a seismically active region. However as discussed previously, the Project Site is not located within a seismically induced landslide hazard zone or liquefaction hazard zone.

The alluvial materials encountered in the exploratory borings are predominantly silty sand with gravel. The potential for seismically induced settlement at the Project Site is considered small and the geotechnical conditions are favorable for foundations, as well as for the permanent retaining structure, provided the design and construction of the Proposed Project is to the satisfaction of the Department of Building and Safety. Additionally, the design and construction of the Project would conform to the Los Angeles Building Code seismic standards as approved by the Department of Building and Safety.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the loss of soil strength or stiffness due to buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine- to medium-grained, cohesionless soils. The Geotechnical Report found that the subsurface profile at the Project Site consists of artificial fill ranging in depths of 2 feet to 3.5 feet in thickness. The fill on the Project Site consists of silty sand with occasional gravels that range between 0.25 and 0.5 in length. Alluvium material underlies the fill, and consists of light brown silty sand to gravelly sand.

No active surface groundwater seepage was observed on the Project Site. The subsurface exploration did not encounter groundwater to a depth of 26 feet. However, because the native soils at the planned foundation levels consist of silty sand with gravel, the Project Site is not subject to liquefaction. As stated in the Geotechnical Report, the Project Site is not located within an area identified as having a potential for liquefaction.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Landslides?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related, significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. According to the Geotechnical Report, no landslides are mapped near the Proposed Project, and the Project Site is not in a designated earthquake-induced landslide hazard zone. Therefore, the probability of landslides, including seismically induced landslides, is considered very low.

Impacts would not occur.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have significant sedimentation or erosion impacts if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on site. Although development of the Proposed Project has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low because of both the predominantly level topography of the Project Site and the fact that the Project Site would be mostly paved over or built upon, so little soil would be exposed.

Nevertheless, all grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS), which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills.

The grading plan would conform to the City's Landform Grading Manual Guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes, but is not limited to, the following measures: A deputy grading inspector would be on site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector would report weekly to LADBS; however, they would immediately notify LADBS if any conditions are violated. "Silt fencing" supported by hay bales and/or sand bags would be installed based on the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through any chain-link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts. "Orange fencing" would not be permitted as a protective barrier from the secondary impacts normally associated with grading activities. Movement and removal of approved fencing would not occur without prior approval by LADBS.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Report concluded that the potential for seismically induced settlement at the Project Site is considered small and the geotechnical conditions are favorable for foundations, as well as the permanent retaining structure, provided that the recommendations specified in the Geotechnical Report are included in the design and construction of the Proposed Project to the satisfaction of the LADBS. Construction of the Proposed Project would comply with the City of Los Angeles Uniform Building Code (Building Code). Code requirement to prevent soil erosion, as stated above, would be in place.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

The Geotechnical Report determined that expansive soils were not encountered on the Project Site. The fill on the Project Site consists of silty sand and gravel that ranges between 1/4 to 1/2 inches in length... Underlying the fill is alluvium material, which consists of light brown silt sand to sand with gravel up to 3 inches. Groundwater was not encountered on the Project Site in borings drilled to a maximum depth of 26 feet. As discussed in **Section 4.9, Hydrology**, groundwater was encountered at 37 to 40 feet. However, because the native soils at the planned foundation levels consist of silty sand with gravel, the Project Site is not subject to liquefaction. Construction of the Proposed Project would be required to comply with the City of Los Angeles *Uniform Building Code*, which includes building foundation requirements appropriate to site-specific conditions, as recommended in the Geotechnical Reports. Code requirement and measures to prevent soil erosion, as stated above, would be in place.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems are necessary, nor are they proposed.

Impacts would not occur.

Mitigation Measures: No mitigation measures are required.

4.7 GREENHOUSE GAS EMISSIONS

Impact Analysis

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

Less than Significant Impact. A significant impact would occur if the project would either directly or indirectly generate greenhouse gas emissions that may have a significant impact on the environment. The City of Los Angeles has not adopted specific significance thresholds for greenhouse gas (GHG) impacts. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature.

The principal GHGs are carbon dioxide (CO2), methane (CH_4), nitrous oxide (N2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). CO2 is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e).

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires the California Air Resources Board (CARB), the State agency charged with regulating Statewide air quality, to adopt rules and regulations that would achieve greenhouse gas emissions equivalent to Statewide levels in 1990 by 2020.

As a central requirement of AB 32, the CARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 greenhouse gas emissions limit. The Scoping Plan, which was developed by CARB in coordination with the Cap-and-Trade program, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall greenhouse gas emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

CARB updated the Scoping Plan in May 2014 through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2014 Scoping Plan). CARB's updated projected "business as usual" (BAU) emissions in the 2014 Scoping Plan are based on current economic forecasts (i.e., as

influenced by the economic downturn) and certain GHG reduction measures already in place. The BAU projection for 2020 GHG emissions in California was originally estimated to be 596 MMTCO2e. The updated calculation of the 2014 Scoping Plan's estimates for projected emissions in 2020 totals 509 MMTCO2e. Considering the updated BAU estimate of 509 MMTCO2e by 2020, CARB estimates that the State would have to reduce GHG emissions by 21.6-percent from BAU without Pavley regulations which reduce GHG emissions in new passenger vehicles and the 33 percent renewable portfolio standard (RPS); or 15.7 percent from the adjusted baseline (i.e., with Pavley regulations and 33 percent RBS) to return to 1990 emission levels (i.e., 427 MMTCO2e) by 2020, instead of the 28.35 percent BAU reduction previously reported under the Scoping Plan.[16]

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities.

There are no federal, State, or local adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15604.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of greenhouse gas emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification of the extent to which the Project increases greenhouse gas emissions as compared to the existing environmental setting; and (4) 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 greenhouse gas emissions.

In addition, as a central component of the CEQA Guidelines, there is substantial evidence to support that compliance with the LA Green Building Code is qualitatively consistent with Statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan and 2014 Updated Scoping Plan. Among the many GHG reduction measures outlined later in this section, the LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy

16 California Air Resources Board (CARB), Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, page 11, CARB, May 2014.

Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development Project that can demonstrate it complies with the LA Green Building Code is considered consistent with Statewide GHG-reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

To reduce GHG emissions from energy usage, the City's Department of Environmental Protection, EnvironmentLA, proposes the following goals: increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP) to decrease dependence on fossil fuels; present a comprehensive set of green building policies to guide and support private sector development; reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizen to use less energy. Based on the 2012 US Department of Energy Annual Survey, the City's emission reduction programs reduced almost 97,000 tons of greenhouse gas emissions.

Construction

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. To be consistent with the guidance from the SCAQMD for calculating criteria pollutants from construction activities, only GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. As explained by California Air Pollution Control Officer's Association (CAPCOA) in its 2008 white paper, the information needed to characterize GHG emissions from manufacture, transport, and end-of-life of construction materials would be speculative at the CEQA analysis level. CEQA does not require an evaluation of speculative impacts (*CEQA Guidelines* Section15145). Therefore, the construction analysis does not consider such GHG emissions.

All GHG emissions are reported on an annual basis. Construction of the Project is anticipated to take 10 months, so all emissions of GHGs associated with construction activities were considered. Emissions of GHGs were calculated using CalEEMod for the ten months of construction of the Proposed Project and the results of this analysis are presented in **Table 4.7-1, Proposed Project Construction-Related Greenhouse Gas Emissions**. As shown in **Table 4.7-1**, the annual increase in GHG emissions from construction activities would be 131.66 metric tons.

Table 4.7-1
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO2e Emissions (Metric Tons per Year)[a]
2016	131.66
Total Construction GHG Emissions	**131.66**

[a] *Construction CO2 values were derived using CalEEMod Version 2013.2.2 Calculation data and results are provided in **Appendix A** of this Initial Study.*

Operation

The GHG emissions resulting from operation of the Proposed Project, with involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment, hearth combustion, and generation of solid waste and wastewater, were calculated assuming code compliance with the LA Green Building Code. Emissions of operational GHGs are shown in **Table 4.7-2, Proposed Project Operational Greenhouse Gas Emissions.** As shown, the increase in GHG emissions generated by the Proposed Project with incorporation of the mandatory LA Green Building Code measures would be 379.50 MMTCO2e per year.

Table 4.7-2
Proposed Project Operational Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MTCO2e/year)
Construction (amortized)	4.39
Operational (mobile) sources	276.86
Area sources	0.41
Energy	76.07
Waste	5.02
Water	16.75
Annual Total	**379.50**

Source: CalEEMod Version 2013.2.2.
* *N20 emissions account for 0.25 MTCO2e per year. Emissions calculations are provided in **Appendix A, Air Emissions Modeling.***

As discussed previously, a project's GHG emissions typically would be relatively very small in comparison to State or global GHG emissions and, in isolation, they would have no significant direct impact on climate change. Rather, it is the increased accumulation of GHGs from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse

environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHGs and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. The GHG analysis presented in this section analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Project's contributing effect on global warming.

As noted above, there is substantial evidence to support that compliance with the LA *Green Building Code* is qualitatively consistent with Statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding Scoping Plan. As discussed previously, the City adopted the LA Green Plan to provide a Citywide plan for achieving the City's GHG emissions targets, for both existing and future generation of greenhouse gas emissions. To further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current LA *Green Building Code* applicable to new development projects. As it relates to new development, the City adopted the LA Green Building Code (Ordinance No. 181480), which incorporates applicable provisions of the CALGreen Code, and in some cases outlines more strict GHG reduction measures available to development projects in the City of Los Angeles. The LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels. The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, as the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development Project that can demonstrate it complies with the LA Green Building Code is considered consistent with Statewide GHG-reduction goals and policies, including AB 32.

Through required implementation of the LA Green Building Code, the Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs, including CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. The Proposed Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant. The utilization of low- and non-VOC-containing paints, sealants, adhesives, and solvents would be implemented in the construction of the project to further reduce the Proposed Project's greenhouse gas emissions.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. The goal of Assembly Bill (AB) 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. In 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. In addition, Executive Order S-3-05 aims to reduce Statewide GHG emissions to 80 percent below 1990 levels by 2050. As previously mentioned, to reduce GHG emissions from energy usage, the City's Department of Environmental Protection, EnvironmentLA, proposes the following goals as drafted in their GreenLA and ClimateLA plans: increase the amount of renewable energy provided by the LADWP to decrease dependence on fossil fuels; present a comprehensive set of green building policies to guide and support private sector development; reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizens to use less energy.

As described previously, through required implementation of the LA Green Building Code, the Proposed Project would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The Proposed Project's generation of GHG emissions would not make cumulatively considerable contribution to conflicting with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Discussion

The following section summarizes and incorporates by reference information from the Phase I, Environmental Site Assessment, Vacant Property, 5107-5123 Echo Street, Los Angeles, CA 90042 dated August 22, 2014 ("Phase I ESA") prepared by EEG Services.[17] The Phase I ESA for the Project Site is included as **Appendix D** of this Initial Study.

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

Less than Significant Impact. The Proposed Project would not result in the routine transport, use, or disposal of hazardous materials. No hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes would routinely be transported to the site and use of these substances would comply with State health codes and regulations. The Proposed Project would not create a significant hazard to the public or the environment.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact.

Construction

Construction activities may involve the use of hazardous materials, which may include fuels, lubricants, coatings, and grease related to construction equipment and activities. However, hazardous materials would be used in accordance with regulatory standards and protocols, and would not be in such quantities or stored in such a manner as to pose significant safety hazards. These activities would also be short term or one time in nature and would cease upon Project completion.

17 EEG Services, Phase I Environmental Site Assessment, Vacant Property, 5107-5123 Echo Street, Los Angeles, California 90042 (August 22, 2014).

The transport, storage, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Such compliance would ensure that all potentially hazardous materials are used and handled in an appropriate manner, and would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations regarding the cleanup and disposal of the contaminant released. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Adherence to the Los Angeles County Hazardous Waste Management Plan (HWMP) and all other emergency response plan requirements set forth by the City of Los Angeles, the City of Los Angeles Fire Department, and the City's Department of Public Works would be required through the duration of the Project. Impacts would be less than significant.

Operation

The use of small amounts of cleaning and related materials would be categorized as potentially hazardous materials. These materials would be stored on the Project Site in small quantities with the purpose of cleaning and maintaining operations of the facility. The limited use of various pesticides and fertilizers would be permitted for landscaping maintenance on the Project Site. The use, storage, transport, and disposal of these potential hazardous materials by maintenance staff would be required to comply with the existing regulations of several agencies, including the Department of Toxic Substances Control (DTSC), USEPA, Occupational Safety and Health Administration (OSHA), City of Glendale Fire and Police Department, Department of Public Works and Caltrans. As such, impacts would be less than significant.

As the Phase I ESA indicated, because there are no structures on site, there is no presence of asbestos or lead-based paint on site. Therefore, no impacts would occur as a result of asbestos or lead-based paint. The Phase I ESA identified that no polychlorinated biphenyl (PCB) compounds were noted on site.

Additionally, according to the City of Los Angeles Methane Zone map,[18] the Project Site is not located within a methane or methane buffer zone. No impacts would occur as a result of methane gas.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

18 City of Los Angeles Methane Zone Map (2004). http://methanetesting.org/PDF/LA_MethaneZones.pdf.

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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

The closest school to the Project Site is the Academia Avance Charter School, located at 115 N. Avenue 53, approximately 0.15 miles northeast of the Project Site. Los Angeles Unified School District's (LAUSD) Arroyo Seco Museum Science Magnet located at 4805 Sycamore Terrace, approximately 0.25 miles northwest of the Project Site. 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 and use of these substances would comply with State health codes and regulations. The Proposed 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.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. As mentioned previously, a Phase I ESA) was conducted for the Project Site by EEG Services on August 22, 2014. The Phase I ESA was conducted in general accordance with ASTM

Standard Practice E 1527-05 and the United States Environmental Protection Agency (US EPA) All Appropriate Inquiry (AAI) Rule. A summary of the environmental concerns are as follows:

Underground Storage Tanks

The Phase I ESA determined that no above-ground storage tanks (AST) were observed at the Project Site. Additionally, the Phase I ESA also determined there were no indication underground storage tanks (UST) on the Project Site.

The Phase I ESA did not encounter evidence of recognized environmental conditions (REC) or historical recognized environmental conditions (HREC) associated with the Project Site. No impacts would occur and no mitigation measures would be required.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

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

No Impact. The closest public airports to the Project Site are the Burbank Airport and the Los Angeles International Airport (LAX). However, neither airport is located within 2 miles of the Project Site. Additionally, the Project Site is not in an airport hazard area.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Proposed Project is not near a private airstrip and not within an area that would expose residents and workers to a safety hazard.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

g. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if the project involved possible interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new (or interfere with an existing) emergency response or evacuation plan, and the severity of the consequences.

The Proposed Project is not located on or near an adopted emergency response or evacuation plan.[19] Prior to the issuance of a building permit, the applicant would develop an emergency response plan in consultation with the Fire Department. 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 departments. Development of the Project Site may require temporary and/or partial street closures due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns and/or impede public access or travel on public rights-of-way. Development of the Proposed Project may affect access on Echo Street temporarily during construction. Environmental impacts may result from project construction due to limitations to access of emergency response equipment.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

19 *City of Los Angeles Safety Element*, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles (1990), http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

h. Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[20]

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

20 City of Los Angeles Department of Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/, accessed March 2015.

4.9 HYDROLOGY AND WATER QUALITY

Discussion

a. Would the project violate any water quality standards or waste discharge requirements?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the project would discharge water which does not meet the quality standards of local agencies which 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 compliance with the Standard Urban Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion 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 the site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention will be required as part of the Low Impact Development (LID) and SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits.

Any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. The Proposed Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first 3/4-inch of rainfall in a 24-hour

period, which would reduce the Proposed Project's impact to the stormwater infrastructure. The Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impacts are less than significant

Mitigation Measures: No mitigation measures are required.

Operation

Similar to the existing uses on the Project Site, the Proposed Project would continue to generate surface water runoff. The Project Site is primarily covered with impervious surfaces. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the site. Potential impacts to surface water runoff would be mitigated to a level of insignificance by incorporating stormwater pollution control measures. The Proposed Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first 3/4-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 No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Controls that require the application of BMPs. The Proposed Project would also comply with water quality standards and wastewater discharge requirements set forth by the Standard Urban Stormwater Mitigation Plan (SUSMP) for Los Angeles County and Cities in Los Angeles County and approved by the LARWQCB. Full compliance with the LID Ordinance and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels

sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As mentioned before, the Project Site is primarily impervious. As such, water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was encountered on the Project Site at approximately 37 to 40 below ground surface (bgs). The historical high groundwater level is approximately 20 feet bgs at the Project Site. However, the Proposed Project would not excavate soils beneath the site to a depth of approximately 20 feet below grade and would not impact the groundwater table.

Impacts would not occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. 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. The Project Site is primarily impervious. Implementation of the Proposed Project would not increase site runoff or result any changes in the local drainage patterns. Implementation of the SWPPP, however, would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or

river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns, which would result in flooding on-or off-site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

e. Would the project 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. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of 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. For the purpose of this specific issue, a significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level that exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Proposed Project would substantially increase the probability that polluted runoff would reach the storm drain system.

Two existing storm drain catch basins are located adjacent to the Project Site at Avenue 52, which connects to a storm drain trunk line leading away from the Project Site along Avenue 52.[21] Storm drain facilities are owned and maintained by City of Los Angeles. The Project Site is currently mostly impervious and all surface water is directed off site to the adjacent storm drain system. The Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site currently is, and would continue to be, collected on the site and directed towards existing storm drains in the Project vicinity that have adequate capacity. Pursuant to

21 Los Angeles County Department of Public Works, "Los Angeles County Storm Drain System," http://dpw.lacounty.gov/fcd/stormdrain/index.cfm.

local practice and City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Proposed Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period. The Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. Would the project otherwise substantially degrade water quality?

No Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. The Proposed Project does not include potential sources of contaminants which could potentially degrade water quality and would comply with all federal, State, and local regulations governing stormwater discharge.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. A significant impact would occur if the Proposed Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood, resulting from a severe rainstorm that has a probability of occurring approximately once every 100 years. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located within a designated flood zone.[22] Therefore, the Proposed Project would not place housing within a 100-year flood hazard area.

22 City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, p. 57 (November 1996), http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

h. Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone, which would impede or redirect flood flows. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not in an area designated as a 100-year flood hazard area.[23] The Project Site is located in a highly urbanized area and no changes to the local drainage pattern would occur with implementation of the Proposed Project; therefore, the Proposed Project would not have the potential to impede or redirect floodwater flows.

No impact would occur.

Mitigation Measures: No mitigation measures are required.

i. Would the project 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?

No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including, but not limited to, a seismically induced seiche. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement. Based on the lack of such large enclosed water bodies nearby, seiches and tsunami risks are considered nil. The Proposed 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.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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23 City of Los Angeles, Department of City Planning, *Safety Element of the Los Angeles City General Plan*, p. 57 (November 1996), http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

j. Would the project expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (i.e., seiche and tsunami), or if the Project Site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Proposed Project Site is not located in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project Site is relatively flat and is surrounded by urban development; therefore, it does not contain any sources of mudflow.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.10 LAND USE AND PLANNING

Impact Analysis

a. Would the project physically divide an established community?

No Impact. A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located within an urbanized area of the Northeast Los Angeles community and is consistent with the existing physical arrangement of the properties near the site. No separation of uses or disruption of access between land use types would occur as a result of the Proposed Project. Implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project Site is located within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional land use and zoning plans. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is

within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the Northeast Los Angeles Community Plan, and the LAMC, which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan. The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD's AQMP was updated in 2012 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area.[24] The Proposed Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. As noted in **Section 5.3, Air Quality**, the Proposed Project would not exceed the daily emissions thresholds during the construction or operational phases. The Proposed Project would be consistent with the AQMP.

SCAG Regional Comprehensive Plan. The Project Site is located within the six-county region that comprises the SCAG planning area. The SCAG Regional Comprehensive Plan (RCP) includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The Proposed Project would be consistent with policies set forth in the RCP, as it would redevelop an existing vacant paved lot with a residential development, thereby maximizing a property that is easily accessible to mass transit, and that is less likely to cause an adverse environmental impact. Furthermore, as the Proposed Project would add approximately 24 residential units in the downtown area, generating as many as 82 new residents, the Proposed Project would be consistent with SCAG growth projections.

Local Plans

City of Los Angeles General Plan. The Proposed Project would conform to the applicable objectives outlined in the City of Los Angeles General Plan (General Plan).[25] 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, 10 Citywide elements (Air Quality Element,

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24 Air Quality Management District (AQMD), *Final 2012 Air Quality Management Plan,* http://www.aqmd.gov/aqmp/2012aqmp/Final/index.html.

25 City of Los Angeles General Plan (2002).

Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual plans for each of the City's 35 Community Planning Areas. The elements that would be most applicable to the Proposed Project are the Air Quality Element, Land Use Element, Housing Element, and Transportation Element. Analysis of these elements is as follows:

Air Quality Element

The Proposed Project would comply with SB 375 and AB 32 by contributing to a reduction in GHG emissions through integrated land use, housing, and transportation planning. Additionally, an air filtration system shall be installed to further reduce air quality impacts in conformance with the Air Quality Element. The key component of GHG emissions is the reduction of emissions from passenger vehicles, which represents about one-third of overall GHG emissions in the United States. Land use is among the top strategies to reduce such emissions. Compact development, which includes a mix of land uses, access and proximity to transit, and concentrations of population and/or employment, can reduce congestion, lower infrastructure costs, and reduce household expenses related to transportation and energy, according to a 2010 report published by the Urban Land Institute.[26] The key to successful compact development is a land use pattern that has a high quality pedestrian network and a variety of land uses within walking distance of each other.[27]

The Proposed Project's location would be located less than 3,150 feet southwest of an existing Metro station, and close to numerous bus lines and mixed land uses (including housing, employment, and public space). In addition, existing uses within walking distance include retails uses, parks, and numerous bus stops. As such, the Proposed Project would conform to the Air Quality Element.

Land Use Element

The Proposed Project is approximately one-quarter mile from an existing Metro station. This is consistent with the City's intent that the highest development intensities are targeted generally within one-quarter mile of the transit stations.[28]

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26 Urban Land Institute, The Role Compact Development Can Play in Reducing Green House Gas Emissions, Evidence from Three Recent Studies (2010).

27 Urban Land Institute (2010).

28 *City of Los Angeles General Plan*, Land Use Element (Goal 3k; Policy 3.15.3).

The residential units are the type of development encouraged by the City because it places the new transit-oriented development in a commercial and residential area, while preserving the surrounding neighborhoods adjacent to the area. The Land Use Element states that a considerable mix of uses be accommodated to provide population support and enhance activity near the stations. This may encompass a range of retail commercial, offices, personal services, entertainment, restaurants, and housing that serve both transit users and local residents.[29]

The Proposed Project would provide housing for professional workers in Highland Park.[30] Interest at the street level would be created by maintaining a visually appealing frontage along building edges. Future residents would be approximately 3,150 feet or just a few minutes of walking time from the existing Metro station. The convenience of the Proposed Project's location near transit would be an incentive for many people to use public transportation.

As the Project Site would be located near existing bus stops and the Metro Gold Line, it would reduce the need for automobile trips and miles traveled and increase ridership. As a result, the Proposed Project would accommodate residential uses that support the needs of the City's existing and future residents, businesses, and visitors.[31] The construction of 24 units of new housing units in this specific location would significantly increase the livability and economic activity in the Highland Park neighborhood. As such, the Proposed Project would conform to the Land Use Element.

Housing Element

As stated in the Framework Element, the City of Los Angeles has an insufficient number of vacant properties to accommodate the cumulative amount of population growth that has been forecasted. The supply of land zoned for residential development is the most constrained in the context of population growth forecasts. Thus, should growth and new development in the City occur, it will most likely require the recycling and/or intensification of existing developed properties or conversion of certain uses. The Proposed Project is the redevelopment of an underutilized property (vacant paved lot) with a residential land use.

The Proposed Project would build residential units in close proximity to a multitude of public transit options in a dense urban commercial area. It is the type of new housing development desired by the

29 *City of Los Angeles General Plan*, Land Use Element (Objective 3.4; Policy 3.4.1).
30 *City of Los Angeles General Plan*, Land Use Element (Objective 3.16, 3.8; Policy 3.15.4).
31 *City of Los Angeles General Plan*, Land Use Element (Objective 3.1).

City.[32] The nearest residential uses abut the site to the east and west, and across Echo Street to the south; the Proposed Project would have minimal conflicts with these developments. In addition, the Proposed Project would offer to the residents who live in the surrounding apartments and single- family residences an attractive project with a visually compatible exterior.[33] The Housing section of the Framework Element states that the improvement of the jobs and housing relationships in subareas of the City may be accomplished through the reuse of commercially zoned corridors and development at transit stations which afford the opportunity for the development of a mix of uses, including housing, and can improve localized jobs and housing relationships. The Proposed Project represents this vision, and unites good planning practices by integrating housing with a mix of land uses and transportation nearby.

According to the City's recently released draft Housing Element 2013-2021, the City of Los Angeles will need a variety of housing units to accommodate evolving household types and sizes. The City has continuously gained residents since its founding and is expected to have 4,320,600 residents by 2035. Households without children, especially those headed by householders ages 55 and older, are expected to increase in the next decade. More than half (55.3%) of the City's households have only one or two persons, according to the 2010 Census. The City has been pursuing a sustainable strategy for long-term growth, which encourages growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. The Proposed Project would assist in proving long-term growth with higher density, and as such, would conform to the Housing Element.

Transportation Element

The Proposed Project is in close proximity to two major transportation corridors (North Figueroa Street and York Boulevard), which provides substantial public transit opportunities and facilities, including Metro Bus lines 81 and 83.[34] The development of the Proposed Project with residential uses would promote pedestrian activity and circulation, create direct pedestrian connections between the new Project and the Metro transit infrastructure, and conform to the Transportation Element's policies and objectives.

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32 *City of Los Angeles General Plan*, Open Space and Conservation Element (Objective 6.4, Policy 6.4.8).
33 *City of Los Angeles General Plan*, Open Space and Conservation Element (Objective 2.4, Policy 2.4.1).
34 *City of Los Angeles General Plan,* Transportation Element (Policy 3.5, Policy 3.12).

Northeast Los Angeles Community Plan

The Project Site is located within the Secondary Activity Center Subarea (Subarea 2) of the Avenue 57 TOD Neighborhood Plan located within Northeast Los Angeles Community Plan Area (CPA).[35] Therefore, all on-site development activity is subject to the land use regulations of the Northeast Los Angeles Community Plan. The Community Plan goals and objectives include providing organized growth, a Northeast Los Angeles identity, and a full range of housing choices for employees and residents in the downtown area. As described in the Community Plan, the Highland Park area offers an opportunity to preserve and enhance the positive characteristics of residential neighborhoods, while providing a variety of compatible new housing opportunities.[36] The Highland Park area should be considered an area with historic nature represented by a strong architectural heritage.[37]

Avenue 57 Transit Oriented District (TOD) Neighborhood Specific Plan

As noted previously, the Project Site is located within the western portion of the Avenue 57 TOD Neighborhood Specific Plan. The Specific Plan was adopted to implement the goals of the Northeast Los Angeles Community Plan, as well as the General Plan Framework and the Transportation Elements of the General Plan.[38] The plan is intended to preserve the historic character of the neighborhood, while accommodating anticipated growth.[39] The plan further encourages a range of housing types to allow a diversity of income ranges.[40] The Project Site is located within Subarea 2: Secondary Activity Center and the type of residential units proposed and the design of the Proposed Project is consistent with the character of this neighborhood and the applicable standards in the Specific Plan.

Los Angeles Municipal Code

The Proposed Project would not conflict with the goals, objectives, and allowable land uses in the Northeast Los Angeles Community Plan, Avenue 57 Specific Plan and the LAMC.[41] The General Plan land

35 City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan* (1999), http://cityplanning.lacity.org/complan/pdf/nlacptxt.pdf.

36 City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan*, Community Issues and Opportunities (1999), http://cityplanning.lacity.org/complan/pdf/nlacptxt.pdf.

37 City of Los Angeles Department of City Planning, *Northeast Los Angeles Community Plan* (1999), http://cityplanning.lacity.org/complan/pdf/nlacptxt.pdf.

38 City of Los Angeles Department of City Planning, *Avenue 57 Transit Oriented District*, Section 2(a), Purposes (2002), http://cityplanning.lacity.org/complan/specplan/pdf/AVE57TOD.PDF.

39 City of Los Angeles Department of City Planning, *Avenue 57 Transit Oriented District*, Section 2(d), Purposes (2002), http://cityplanning.lacity.org/complan/specplan/pdf/AVE57TOD.PDF.

40 City of Los Angeles Department of City Planning, *Avenue 57 Transit Oriented District*, Section 2(e), Purposes (2002), http://cityplanning.lacity.org/complan/specplan/pdf/AVE57TOD.PDF.

41 City of Los Angeles Department of City Planning, Parcel Profile Reports, Zoning Information and Map Access System (ZIMAS), http://www.zimas.lacity.org.

use designation for the Project Site is Neighborhood Commercial and the zoning designation is [Q]C4-2D-HPOZ, which allows for residential and commercial retail land uses. Residential uses are permitted on lots zoned for C4 uses that are located within the Northeast Los Angeles Community Plan Area. Therefore, the Proposed Project would conform to the allowable land uses pursuant to the LAMC.

Floor Area

The zoning designation for the Project Site is [Q]C4-2D-HPOZ. As discussed before, Height District No. 2 permits a FAR of 3 times the buildable area of the lot. The maximum permitted floor area of the Project Site is also restricted by the "D" limitation, which restricts the FAR to 3 times the buildable area of the lot. The Avenue 57 Specific Plan further restricts residential development within the area to 1.5 to maintain consistency with the adopted Northeast Los Angeles Community Plan. The Project Site would have a total floor area of 50,173 square feet and a total lot area of 39,108 square feet for a total proposed FAR of 1.3 to 1. As such, the total proposed FAR for the Proposed Project would comply with Northeast Los Angeles Community Plan, Avenue 57 Specific Plan and Los Angeles Municipal Code (LAMC) requirements.

Open Space

The Proposed Project would be compliant with the open space requirements of the LAMC. The Proposed Project would provide code-required residential open space. The Proposed Project would be required to provide a total of approximately 6 trees on site because LAMC requires 1 on-site tree for each four dwelling units. LAMC allows street trees to be counted as part of the on-site tree count. The Proposed Project would provide a total of 12 trees complying with the LAMC.

Parking

As stated in **Section 3.0, Project Description,** the Proposed Project would be compliant with the parking requirements of the LAMC. Bicycle parking would also satisfy the requirements of the LAMC. The Proposed Project would include 8 bicycle spaces. The parking garage located within each unit would provide a total of 48 parking spaces to serve residents. The Proposed Project would also include 4 on-site guest parking spaces for a total of 52 parking spaces. Vehicle and bicycle parking would satisfy the requirements of LAMC.[42]

42 City of Los Angeles Department of City Planning, *Parking Requirements, LAMC,* sec. 12.21 A.4.

Plan Consistency

As discussed previously, the Proposed Project would not conflict with local and regional plans applicable to the Project Site.. The applicant is requesting the following discretionary approval: a zone change from Limited Commercial zone, [Q]C4-2D-HPOZ, to Restricted Density Multiple Dwelling Zone, [T][Q]RD1.5-2D-HPOZ. The Proposed Project would include residential uses permitted by Restricted Density Multiple Dwelling Zone (RD1.5). The Project Site would retain the height district (2D) and Historic Preservation Overlay Zone (HPOZ) designations. The RD1.5 zone permits building height up to 45 feet, and the height of the Proposed Project would be 39.25 feet to the top of the stair roof access, which is within the 45-foot requirement. Thus, the Proposed Project would be in compliance with this height standard. The [T] stands for Tentative Zone Classification. The zoning classification involves public improvements as a result of a zone change. Instead of rezoning the Project Site, it would be placed in a [T] classification pending the recording of a Final Map.[43] The Proposed Project would be compatible with nearby residential properties located to the south that are zoned RD1.5-1-HPOZ.

Pursuant to the provisions of LAMC Section 11.5.7.C, the Applicant is also requesting the approval of a Project Permit Compliance Review, to allow for the Proposed Project located within the geographic boundaries of the Avenue 57 TOD Neighborhood Plan to proceed. Additionally, the Applicant is requesting a Certificate of Compatibility (CCMP) for the Historic Preservation Overlay Zone (HPOZ). The Applicant would request approvals and permits from the Department of Building and Safety (and other municipal agencies) for project construction activities including, but not limited to, the following: shoring, grading, foundation, and building and tenant improvements.

No Impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A project-related significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. As discussed previously, no such plans presently exist which govern any portion of the Project Site. Further, the Project Site is located in an area that is already fully developed with commercial and residential uses, and is also within a heavily urbanized area of Los Angeles. Therefore, the Proposed Project would not have the potential to cause such effects.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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43 LAMC, sec. 12.32(g)(1), Special Zoning Classification, T Classification.

4.11 MINERAL RESOURCES

Impact Analysis

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally important mineral resource, or if the project development would convert an existing or future regionally important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone 2 (MRZ-2) Area, or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or Statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is located within the Los Angeles Downtown Oil Field. However, the Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area.[44] No impacts associated with the loss of availability of a known mineral resource would occur.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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

No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if the development would convert an existing or future regionally important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally important mineral resource extraction. The

44 City of Los Angeles Department of Public Works, Mineral Resources and Oil Fields in East Los Angeles County, Los Angeles County Bicycle Master Plan Draft PEIR, Figure 3.8-2 (January 2012).

Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area.[45] The Project Site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

45 City of Los Angeles Department of Public Works, Mineral Resources and Oil Fields in East Los Angeles County, Los Angeles County Bicycle Master Plan Draft PEIR, Figure 3.8-2 (January 2012).

4.12 NOISE

Impact Analysis

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact. A significant impact may occur if a project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction

Construction-related noise impacts would be significant if, as indicated in Section 112.05 of the LAMC, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibel (dBA) at a distance of 50 feet from the noise source. This noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site, noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a 3-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Proposed Project would require the use of heavy equipment for site clearing, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The US Environmental Protection Agency (EPA) has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site is presented in **Table 4.12-1, Noise Range of Typical Construction Equipment**, and **Table 4.12-2, Typical Outdoor Construction Noise Levels**, respectively, at a distance of 50 feet from the noise source (i.e., reference distance). The noise levels shown in **Table 4.12-1** represent composite noise levels associated

with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in **Table 4.12-2**, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity.[46] These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor.

Table 4.12-1
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA Leq at 50 Feet[a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

46 Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA Leq (i.e., the equipment does not operate at the peak noise level over the entire duration).

Table 4.12-2
Typical Outdoor Construction Noise Levels

Construction Phase	Approximate Leq dBA with Mufflers			
	50 Feet	60 Feet	100 Feet	200 Feet
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74

Source: Unites States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliance, PB 206717, 1971.

Project construction activities would be expected to occur and generate noise. These activities include site preparation and the physical construction and finishing of the proposed structures. Land uses on the properties surrounding the Project Site primarily include commercial, as well as single-family and multifamily residential uses. Single- and multifamily residential uses have been identified as the most likely sensitive receptors to experience noise level increases during Project construction.

Long-term operation of the Project would have a minimal effect on the noise environment near the Project Site. Noise generated by the Project would result primarily from normal operation of the building's mechanical equipment and from off-site traffic.

The City of Los Angeles Noise Element of the General Plan indicates that Project Site would be located within 65 dB community noise equivalent level (CNEL), which is a conditionally acceptable noise level during construction.[47] As stated in the noise element, conditionally acceptable is associated with new construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design.[48] On-site noise sources typically consist of traffic to and from the Project Site and mechanical equipment. Noise associated with resident arrival and departure would be short-term in nature. The number of peak-hour trips to and from the Project Site would be generated during the PM peak hours of which 19 peak-hour trips would be generated. This increase in peak-hour trips would result in a negligible increase in vehicle noise along Echo Street.

Due to the use of construction equipment during the construction phase, the Proposed Project would expose surrounding off-site receptors to increased ambient exterior noise levels. It should be noted that

47 City of Los Angeles General Plan, Noise Element, Exhibit I (1999), http://planning.lacity.org/cwd/gnlpln/NoiseElt.pdf.
48 City of Los Angeles General Plan, Noise Element, Exhibit I (1999), http://planning.lacity.org/cwd/gnlpln/NoiseElt.pdf.

any increase in noise levels at off-site receptors during construction of the Proposed Project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., excavation and grading work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed buildings) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

As mentioned previously, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a 3-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise-sensitive use, would normally result in a significant impact. Since construction activities associated with each of the proposed developments at the Project Site would last for more than 10 days in a 3-month period, the Proposed Project would cause a significant noise impact during construction if the ambient exterior noise levels at the identified off-site and on-site sensitive receptors would be increased by 5 dBA or more. Based on the criteria established in the L.A. *CEQA Threshold Guide,* a substantial temporary or periodic increase in ambient noise levels would occur at the identified off-site sensitive receptors.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Construction is prohibited on Sundays and all federal holidays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. In addition, pursuant to the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. Although the estimated construction-related noise levels associated with the Proposed Project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the Proposed Project would exceed the existing ambient noise levels at two of the identified off-site sensitive receptors by more than the 5 dBA threshold established by the *L.A. CEQA Thresholds Guide* during all construction phases. As such the Proposed Project would comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

Operational

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structure. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the existing buildings in the Project vicinity. As such, the HVAC equipment associated with the Proposed Project would not represent a new source of noise in the Project vicinity. The operation of this and any other on-site stationary sources of noise would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels.

The operation of on-site, Project-related mechanical equipment, such as air conditioning equipment and exhaust fans, may generate audible noise levels. Mechanical equipment would likely be located on building rooftops, which would be shielded from nearby uses.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

b. *Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*

Less than significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The

range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction

Construction activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. The construction activities associated with the Proposed Project could have an adverse impact on both sensitive structures (i.e., building damage) and populations (i.e., annoyance).

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's (Caltrans) adopted vibration standards for buildings are used to evaluate potential impacts related to project construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[49]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced concrete, steel, or timber.
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings.
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

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49 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses.

Table 4.12-3, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in **Table 4.12-3,** vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Table 4.12-3
Vibration Source Levels for Construction Equipment

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

There are no known historic or otherwise vibration-sensitive structures within 25 feet of the Project Site. As shown in **Table 4.12-3**, at distances greater than 25 feet from the Project Site boundary, construction-related vibration levels would not exceed 0.089 PPV. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage. As maximum off-site vibration levels would not exceed 0.089 PPV, there would be no potential for Project construction to result in vibration levels exceeding the most restrictive threshold of significance. Impacts with respect to building damage resulting from Project-generated vibration would be less than significant.

In terms of human annoyance resulting from vibration generated during construction, the single- and multifamily residential uses located near the Project Site could be exposed to increased vibration levels. As such, the Proposed Project would comply with the City of Los Angeles Noise Ordinance No. 144,331

and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

Operation

The Proposed Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks may be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring near the Project Site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for operational noise impacts, a project would normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in **Table 4.12-4, Community Noise Exposure (CNEL)**, to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. To achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the

analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a Leq standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Table 4.12-4
Community Noise Exposure (CNEL)

Land Use	Normally Acceptable[a]	Conditionally Acceptable[b]	Normally Unacceptable[c]	Clearly Unacceptable[d]
Single-family, Duplex, Mobile Homes	50–60	55–70	70–75	above 75
Multifamily Homes	50–65	60–70	70–75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–70	60–70	70–80	above 80
Transient Lodging—Motels, Hotels	50–65	60–70	70–80	above 75
Auditoriums, Concert Halls, and Amphitheaters	—	50–70	—	above 70
Sports Arena, Outdoor Spectator Sports	—	50–75	—	above 75
Playgrounds, Neighborhood Parks	50 –70	—	67–75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–75	—	70–80	above 80
Office Buildings, Business, and Professional Commercial	50–70	67–77	above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50–75	70–80	above 75	—

Source: Office of Planning and Research. State of California Genera Plan Guidelines (October 2003) (in coordination with the California Department of Health Services); City of Los Angeles. General Plan Noise Element (adopted February 1999).

[a] Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

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

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

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant.

According to the Trip Generation Assessment provided for the Proposed Project, the proposed development would result in 186 daily vehicle trips, including 16 AM peak-hour trips (3 inbound, 13 outbound) and 19 PM peak-hour trips (13 inbound, 6 outbound). As shown in the Trip Generation

Assessment, the Proposed Project would not have the potential to double the traffic volumes on any roadway segment near the Project Site, and would not have the potential to increase roadway noise levels by 3 dBA. Traffic-generated noise impacts would be considered less than significant.

Operational Noise: Stationary Noise Sources

New stationary sources of noise, such as rooftop mechanical HVAC equipment would be installed on the proposed buildings at the Project Site. The design of this equipment would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Impacts would be less than significant.

Parking Garage Noise

Noise would be generated by activities within the new parking garages associated with the Proposed Project. Sources of noise within the parking areas would include engines accelerating, doors slamming, and car alarms. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit the Project Site. As the parking garages are entire enclosed and located on the ground floor of the residential units, noise generated at these levels would likely be imperceptible at ground-level locations on and adjacent to the Project Site. Operational-related noise generated by motor-driven vehicles within the Project Site is regulated under the LAMC. With regard to motor-driven vehicles, Section 114.02 of the LAMC prohibits the operation of any motor-driven vehicles on 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, the Proposed Project would comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact. A significant impact may occur if the Proposed Project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the Proposed Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. The *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a 3-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

As discussed previously, impacts are expected to be less than significant for construction noise and vibration, and operational noise and vibration.

Impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

e. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact may occur if a proposed 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 near a project site. There are no airports within a 2-mile radius of the Project Site, nor is the Project Site within any airport land use plan or airport hazard zone. The Proposed Project would not expose people to excessive noise levels associated with airport uses.

No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. This question would apply to a project only if it were near a private airstrip and would subject area residents and workers to a safety hazard. The Project Site is not located near a private airstrip.

No impact would occur.

Mitigation Measures: No mitigation measures are required.

4.13 POPULATION AND HOUSING

Impact Analysis

a. Would the project 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 may 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build-out, and would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

SCAG Regional Comprehensive Plan

In October 2008, SCAG approved and adopted the 2008 Regional Comprehensive Plan (RCP) for the SCAG Region—Helping Communities Achieve a Sustainable Future.[50] The 2008 RCP is a long-term comprehensive plan that provides a strategic vision for handling the region's land use, housing, economic, transportation, environmental, and overall quality-of-life needs. The 2008 RCP was intended to serve as an advisory document for local agencies in the SCAG region.

SCAG Regional Transportation Plan Sustainable Communities Strategy

In April 2012, SCAG adopted the Regional Transportation Plan 2012–2035 Sustainable Communities Strategy (RTP/SCS).[51] As a designated Metropolitan Planning Organization (MPO) under federal law, SCAG is responsible for developing and adopting a long-range RTP every 4 years. The plan evolved out of a massive outreach undertaking involving a broad range of stakeholders across the region to update the shared vision for the region's sustainable future. The RTP/SCS includes a strong commitment to reduce

50 Southern California Association of Governments, *2008 Regional Comprehensive Plan.* (2008).

51 Southern California Association of Governments (SCAG), *Regional Transportation Plan 2012-2035 Sustainable Communities Strategy,* adopted April 2012.

emissions from transportation sources to comply with Senate Bill 375, improve public health, and meet the National Ambient Air Quality Standards set forth by the federal Clean Air Act. The RTP/SCS focuses on the interconnected components of economic, social, and transportation investments that are required to achieve a sustainable regional multimodal transportation system. The goals and policies of the RTP/SCS require the participation of individual municipalities and multilevel investment of stakeholders throughout the region.

SCAG's Compass Growth Vision Strategy

SCAG's Compass Growth Vision, adopted in 2004, and incorporated into the *2008 RCP*, encourages better relationships between housing, transportation, and employment.[52] The Compass Growth Vision is driven by four key principles: (1) Mobility—Getting where we want to go, (2) Livability—Creating positive communities, (3) Prosperity—Long-term health for the region, and (4) Sustainability—Preserving natural surroundings. The Proposed Project is consistent with the goals and strategies of the 2008 RCP and the Compass Growth Vision Strategy discussed above. With respect to regional growth, SCAG forecasts that the population in the City of Los Angeles Subregion will increase to 4.34 million persons by 2030. As shown in **Table 4.13-1, SCAG's 2008 Regional Transportation Plan (RTP) Growth Forecast for the City of Los Angeles Subregion**, the forecast from 2010 through 2030 projects growth of 290,797 additional persons, which yields a 6.7 percent growth rate.

Table 4.13-1
SCAG's 2008 Regional Transportation Plan (RTP) Growth Forecast for the City of Los Angeles Subregion

Projection Year	Population	Household	Person/Household
2010	4,057,484	1,386,658	2.92
2030	4,348,281	1,578,850	2.75
Net Change from 2010 to 2030	**290,797**	**192,192**	
Percent Change	6.70%	13.20%	

Source: SCAG, 2008 Regional Transportation Plan (RTP) Update (adopted May 8, 2008).

Based on the community's current household demographics (i.e. an average of 3.4 persons per household for the Project Site within the Northeast Los Angeles area), the construction of 24 additional residential units on the Project Site would result in an increase in approximately 82 residents in the City

52 Southern California Association of Governments, *Compass Growth Vision.* (2004).

of Los Angeles.[53] The overall increase of 24 housing units and corresponding population of 82 residents would be consistent with the SCAG forecast of 192,192 additional households and approximately 290,797 people in the City of Los Angeles between 2010 and 2030. As such, the Proposed Project would not cause unexpected growth (i.e., new housing or employment generators). The Proposed Project would not accelerate development in an undeveloped area that exceeds projected/planned levels for the year of the Proposed Project occupancy and build-out that would result in an adverse physical change in the environment or would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan. The Proposed Project would be consistent with the goals and strategies of SCAG's Regional Comprehensive Plan and the Compass Growth Vision Strategy.

The Proposed Project would provide residential units on an underutilized site. No displacement of existing housing would occur with the Proposed Project. As stated before, the proposed residential use is consistent with the allowable uses as permitted by the LAMC zoning code and General Plan land use designations. The Proposed Project is the type of project encouraged by SCAG and City policies to accommodate growth in urban centers located close to existing employment centers and mass transit.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Would the project 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on population and housing displacement shall be made considering the following factors:

- The total number of residential units to be demolished, converted to market rate, or removed through other means as a result of the project, in terms of net loss of market-rate and affordable units.

- The current and anticipated housing demand and supply of market rate and affordable housing units in the project area.

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53 Los Angeles Department of City Planning Demographic Research Unit, Statistical Information, Local Population and Housing Estimates, http://cityplanning.lacity.org/DRU/HomeLocl.cfm.

- The land use and demographic characteristics of the project area and the appropriateness of housing in the area.

- Whether the project is consistent with adopted City and regional housing policies such as the Framework and Housing Elements, Housing and Urban Development (HUD) Consolidated Plan and Comprehensive Housing Affordability Study (CHAS) policies, redevelopment plan, Rent Stabilization Ordinance, and the RCPG.

The Proposed Project would consist of development of new housing on a currently unoccupied site developed with a vacant paved lot. No displacement of existing housing would occur with the Proposed Project. The proposed uses are consistent and allowable with respect to the zoning and General Plan land use designations.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As mentioned previously, the Proposed Project would consist of the development of new housing land uses on a currently unoccupied site developed with a vacant paved lot. No displacement of existing housing would occur.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.14 PUBLIC SERVICES

Impact Analysis

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 with Project Mitigation. Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.09.07A, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. If the distance is exceeded, all structures located in the applicable residential area would be required to install automatic fire sprinkler systems.

The Proposed Project would generate approximately 82 new residents. Therefore, the Proposed Project would marginally increase the demand for LAFD services. The Project Site is served by LAFD Station 12, Highland Park Arroyo Seco Fire Station, located at 5921 N. Figueroa Street, approximately 0.67 miles northeast of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station 12 to the Project Site, fire protection response would be considered adequate.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing. The overall fire flow requirement for the proposed residential development is 4,000 gpm from four fire hydrants flowing simultaneously. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be determined by LAFD during the plan check review process. As such, the Proposed Project would require the incorporation of mitigation measure **XIV-10.**

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measure is proposed to reduce impacts to a less than significant level.

XIV-10 Fire Protection

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit shall be no more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii. Police protection.

Less than Significant Impact with Project Mitigation. For the purpose of this Initial Study, 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is located in the Northeast Area division of the LAPD's Central Bureau. The Northeast Area is approximately 29 square miles and includes the communities of Atwater Village, Cypress Park, Eagle Rock, East Hollywood, Echo Park, Elysian Park, Elysian Valley, Franklin Hills, Garvanza, Glassell Park, Highland Park, Los Feliz, Mount Washington, Silver Lake, and Solano Canyon. The Northeast Area is served by the Northeast Community Police Station, a 65,000-square-foot facility located at 3353 San Fernando Road. Within the Central Area, the Proposed Project is located within Reporting District (RD) 1149.

Implementation of the Proposed Project would result in a slight increase of site visitors, residents, and employees within the Project Site, thereby generating a potential marginal increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would implement principles of the City of Los Angeles Crime Prevention through *Crime Prevention Environmental Design (CPTED) Guidelines*. Specifically, the Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. Fences would be constructed around the site to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.The building and layout design of the Proposed Project would also include nighttime security lighting and secure parking garages located within each townhome unit. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In light of these features, it is anticipated that any increase in demands on police services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. As such, the Proposed Project would implement mitigation measure **XIV-30** to enhance the safety of the Project Site.

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: The following mitigation measures are proposed to reduce impacts to a less than significant level.

XIV-30 **Police (*Design Guidelines*)**

The plans shall incorporate the Design Guidelines (defined in the following sentence) relative to security, semi-public and private spaces, which may include, but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police

Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

iii. Schools.

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the LAUSD. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether the project results in a significant impact on public schools shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand; (c) whether (and to the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and (d) whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

The Project area is currently served by the following LAUSD public schools: Aldama Elementary School, Burbank Middle School, and Franklin High School.

As shown in **Table 4.14-1, Proposed Project Estimated Student Generation,** the Proposed Project would generate approximately 4 elementary students, 1 middle school student, and 1 high school student, for a total of approximately 6 students. It is likely that some of the students generated by the Proposed Project would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Proposed Project would be new to the LAUSD. The Project Applicant will be required to pay mandatory developer fees pursuant to California Education Code, Section 17620(a)(1); to offset the Proposed Project's demands on local schools serving the Project area.

Table 4.14-1
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students
Single-family/Townhome residences[a]	24 du	4	1	1
	Total	**6**		

Source: Student generation rates for residential units are taken from the Los Angeles Unified School District, School Facilities Needs Analysis (September 2012).

[a] *Student generation rates are as follows for residential uses: 0.1649 elementary, 0.0450 middle, and 0.0303 high school students per unit.*
Note: du = dwelling unit; sq. ft. = square feet.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Parks

Less than Significant Impact. e Based on the *L.A. CEQA Thresholds Guide,* the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks). A significant impact would occur if the Proposed Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment.

The Public Recreation Plan, a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards.[54] The Project Site is located within a highly urbanized area of the Northeast Los Angeles community and, as shown in **Table 4.14-2, Recreation and Park Facilities within the Project Area,** has access to approximately parkland and public recreation facilities within a 1-mile radius. It is

54 City of Los Angeles General Plan, Service Systems Element.

estimated that the development of the Proposed Project would result in a marginal increase of 82 new residents to the Northeast Los Angeles Community Plan Area.

Table 4.14-2
Recreation and Park Facilities within the Project Area

Park Name	Park Amenities	Distance to Project Site (mi)
1. Sycamore Grove Park	Children's play area, open space, barbeque pits, picnic tables, tennis courts, band shell, and concession stand	0.3
2. San Pasqual Park	Children's play area, open space, barbeque pits, baseball diamond, basketball courts, picnic tables, and soccer field	0.5
3. Ramona Hall Community Center	Indoor classroom and support space and outdoor recreation	0.6
4. Arroyo Seco Park	Children's play area, open space, barbeque pits, picnic tables, and tennis courts	0.7
5. Carlin G. Smith Recreation Center	Indoor classroom and support space and outdoor recreation	0.7
6. Montecito Heights Recreation Center	Children's play area, open space, indoor gym, picnic tables, and tennis courts, indoor and outdoor basketball courts, volleyball courts, weight room, and outdoor recreation	0.7
7. Moon Canyon Park	Children's play area	0.8
8. Debs Regional Park	Barbeque pits and picnic tables	0.8
9. Debs Lake	Open space	0.8
10. Cleland Avenue Bicentennial Park	Children's play area	0.9
11. Highland Park Recreation Center	Indoor gymnasium, seasonal pool, outdoor basketball court, picnic area, baseball diamond, t-ball diamond, dining room, ping pong, air hockey, children's play area and wheelchair accessible	1.0
11. Budd Wiener Park	Open space and benches	1.0

Source: City of Los Angeles, Department of Recreation of Parks. Location Map. http://raponline.lacity.org/maplocator.

The Proposed Project would result in minimal demand for park services based on a slight increase in residential population. Any demand would be met through payment of applicable taxes in accordance with LAMC Section 17.12(a) or 17.58.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

v. Other public facilities

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to existing library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library [LAPL]).

Within the City of Los Angeles, the 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 make up the LAPL collection. The LAPL branches currently serving the Project Site include the Arroyo Seco Regional Branch Library, located at 6145 N. Figueroa Street, approximately 1 mile northeast of the Project Site; and the Cypress Park Library is located approximately 1.7 miles west of the Project Site at 1150 Cypress Avenue. The Arroyo Seco Library is approximately 14,000 square feet in area. The Arroyo Seco Library and Cypress Park Library currently meet the library demands of the surrounding community and would be able to meet the Proposed Project's marginal demand for library services.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.15 RECREATION

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which would 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

It is reasonable to assume that the future occupants of the Proposed Project would utilize recreation and park facilities in the surrounding area. As noted in **Table 4.14-2**, **Recreation and Park Facilities within the Project Area**, there are 11 existing parks and recreation centers located within a mile of the Project Area that are available to serve the future residents to the Project Site. The Proposed Project would not substantially increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility. As stated previously, any demand would be met through payment of applicable taxes in accordance with LAMC Section 17.12(a) or 17.58.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As stated previously, there are 11 existing parks located within a mile of the Project that

are available to serve the future residents to the Project Site. Although the Proposed Project would place some additional demands on park facilities, the increase in demand would be met through a combination of on-site amenities and existing parks near the Project area. The Proposed Project's increased demands on recreational facilities would not by itself result in the construction of a new park, which might have an adverse physical effect on the environment.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.16 TRANSPORTATION AND TRAFFIC

Impact Analysis

a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

The following section summarizes and incorporates by reference information from the Williams Homes Residential Project Trip Generation Assessment, 5107-5123 Echo Street, City of Los Angeles (Trip Generation Assessment) prepared by Crain & Associates[55] The Trip Generation Assessment is included as **Appendix E** to this Initial Study.

Less than Significant Impact. A significant impact could occur if a project were to result in substantial increases in traffic volumes near the project such that the existing street capacity experiences a decrease in the existing volume to capacity ratios or experiences increased traffic congestion exceeding LADOT's recommended level of service.

Estimated Trip Generation

Trip generation estimates for the Proposed Project were provided by LADOT and were calculated using a combination of previous study findings and the trip generation rates contained in Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012). **Table 4.16-1, Trip Generation Rates—Daily Trips,** summarizes the trip generation estimates for the daily, AM peak-hour, and PM peak-hour periods respectively. As shown in **Table 4.16-1**, the Proposed Project is anticipated to generate 186 weekday trips, including 16 morning peak-hour trips (3 inbound, 13 outbound) and 19 afternoon peak-hour trips (13 inbound, 6 outbound).

55 Crain and Associates, Williams Homes Residential Project Trip Generation Assessment 5107-5123 Echo Street, City of Los Angeles (December 11, 2014). See **Appendix E**.

Table 4.16-1
Trip Generation Rates—Daily Trips

Land Use	Size	Daily	AM Peak Hour Trips			PM Peak Hour Trips		
			In	Out	Total	In	Out	Total
Residential Condominium/ Townhouse	24 du	186	3	13	16	13	6	19
TOTAL		**186**	**3**	**13**	**16**	**13**	**6**	**19**

*Source: Trip Generation, 9th Edition, Institute of Transportation Engineers (ITE), 2012; Crain and Associates, Trip Generation Assessment, December 2014 (See **Appendix E**).*
Note: du = dwelling units

Congestion Management Plan Analysis

The Congestion Management Plan (CMP) requires that, when a Traffic Impact Assessment (TIA) is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the amount of project traffic expected to use these facilities.

CMP Significant Traffic Impact Criteria

The CMP Guidelines state that a CMP freeway analysis must be conducted if 150 or more trips attributable to the proposed development are added to a mainline freeway monitoring location in either direction during the morning or afternoon weekday peak hours. Similarly, a *CMP* arterial monitoring station analysis must be conducted if 50 or more peak-hour project trips are added to a *CMP* arterial monitoring station during the morning or afternoon weekday peak hours of adjacent street traffic.

A significant project-related CMP impact would be identified if the CMP facility is projected to operate at LOS F (V/C > 1.00) and if the project traffic causes an incremental change in the V/C ratio of 0.02 or greater. The proposed development would not be considered to have a regionally significant impact, regardless of the increase in V/C ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of the project traffic.

Based on the trip generation estimates and the trip distribution patterns, the Project is not anticipated to add more than 150 trips to any of the four CMP freeway monitoring locations closest to the study area during either the weekday morning or afternoon peak hour. Therefore, no further analysis is required.

As shown in **Table 4.16-1**, the Project would not generate any additional traffic; therefore, the Project would not add 50 peak hour trips to any intersection. The Project's CMP arterial intersection impacts are considered less than significant, and no further analysis is required.

Construction – Traffic

The Proposed Project would require a variety of other construction vehicles throughout the construction of the Proposed Project. The site-clearing phase would require truck trips. The addition of these vehicles into the street system would contribute to increased traffic in the Project vicinity. The Proposed Project's construction trip traffic would be a fraction of the operational traffic that would not cause any significant impacts at the studied intersection. Therefore, it is not anticipated that they could contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. A construction work site traffic control plan would be submitted to DOT for review and approval prior to the start of any construction work. The plan would show the location of any roadways or sidewalk closures, traffic detours, hours of operation, protective devices, warning signs, and access to abutting properties. DOT also recommends that all construction-related traffic be restricted to off-peak hours.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. As discussed previously, no CMP freeway monitoring segment or intersection analysis is required and there would be no Project-related impacts to the CMP. The Proposed Project would not conflict with any travel demand measures.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Proposed Project only if it involved an aviation-related use or would influence changes to existing flight paths. No aviation-related use would occur.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. A significant impact may occur if a project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features. However the Proposed Project will include a new vehicular access driveway at Echo Street to the Project Site, which would be properly designed and constructed to ensure the safety of pedestrian circulation in the Project area.

Impacts would less than significant.

Mitigation Measures: No mitigation measures are required.

e. Would the project result in inadequate emergency access?

Less than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the project site or adjacent uses.

As previously discussed in **Section 4.8, Hazards and Hazardous Materials**, the Proposed Project is not located on or near an adopted emergency response or evacuation plan.[56]Development of the Project Site may require temporary and/or partial street closures along Echo Street due to construction activities. 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. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. While the Project may necessitate partial closure lane along Echo Street on a temporary and intermittent basis during construction, it is not anticipated that any of the Project's construction activities would impede access within any of the eastbound lanes on Echo Street. Therefore, the Proposed Project would not cause permanent

56 City of Los Angeles General Plan, "*Safety Element*," Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles (1990), http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

alterations to vehicular circulation routes and patterns, or impede public access or travel on public rights-of-way.

As described previously, the Proposed Project would satisfy the emergency response requirements of the LAFD. No hazardous design features that could impede emergency access are included in the access design or site plan for the Proposed Project. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. For the purpose of this Initial Study, a significant impact may occur if a project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on- or off-site.

The Proposed Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Proposed Project would not interfere with any Class I or Class II bikeway systems.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

4.17 UTILITIES AND SERVICE SYSTEMS

Impact Analysis

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board. Section 13260 of the CWC states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project area.

Wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility and, therefore, is subject to the State's wastewater treatment requirements. Wastewater from the Project Site would continue to be treated according to the wastewater treatment requirements enforced by the LARWQCB.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project build-out; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by the LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 450 mgd during the non-summer months and 550 mgd during the summer months, and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.

As shown in **Table 4.17-1, Estimated Project Water Demand**, the Proposed Project would generate a demand for approximately 8,250 gallons per day (gpd) or 9.2 acre-feet per year (afy) of water, which includes annual water conservation. Savings due to required water conservation is 1,650 gpd or 1.9 afy, resulting in a water demand of approximately 6,600 gpd or 7.4 afy. The LA Green Building Code requires projects to achieve a 20-percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50-percent construction waste recycling levels.

In evaluating the Proposed Project's water demand, the Sewer Generation Factors (SGFs) published by the Los Angeles Bureau of Sanitation (LASAN) in 2012 are applied to Proposed Project scope for calculating indoor water use. SGFs are factors of how much wastewater is generated (gpd or gallons per unit). The net increase in water demand, which is the projected additional water demand of Proposed Project, is calculated by subtracting the existing baseline water demand and water saving amount from the total proposed water demand. Based on the estimates provided in **Table 4.17-1,** implementation of the Proposed Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less than significant impact.

Table 4.17-1
Estimated Project Water Demand

Type of Use	Quantity	Unit	Water Use Factor[a] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings	Water Demand (gpd)	Water Demand (afy)
Residential: Townhouse/SFD[b]	24	du	344	8,250	1,650	6,600	7.4
Proposed Water Demand Total						**6,600**	7.4

Notes:
gpd = gallons per day; afy = acre feet per year; sfd = single-family dwelling

[a] *Proposed indoor water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf; 125 percent sewage generation loading factor.*

[b] *This generation rate applies to townhouses/single-family dwellings with more than 3 bedrooms.*

The required minimum fire flow for the development is estimated to be approximately 4,000 gpm based on the Proposed Project's scale and density. The existing fire hydrants located along Echo Street are adequate for fire flow needs for the Proposed Project; no new public fire hydrant installations are anticipated for the Proposed Project.

In the event that any further water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project area, and would not create a significant impact to the physical environment. This is largely because (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

The LASAN provides sewer service to the Proposed Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Treatment Plant (HTP). The HTP treats an average daily flow of 362 million gallons per day (mgd), and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.[57] As shown in **Table 4.17-2, Proposed Project Estimated Wastewater Generation**, the Proposed Project would generate approximately 5,280 gpd.

Table 4.17-2
Proposed Project Estimated Wastewater Generation

Type of Use	Size of Use	Wastewater Generation Rate (gpd/unit)[a]	Total Wastewater Generated (gpd)
Residential:Townhouse/SFD	24 du	275 gpd/unit	6,600
(Less 20% Per LA Green Building Code)			*(1,320)*
Total Project Wastewater Generation			**5,280**

Notes:
gpd = gallons per day; du = dwelling units; sfd = single-family dwelling

[a] *Proposed indoor water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.*

[2] *This generation rate applies to townhouses/single-family dwellings with more than 3 bedrooms.*

In accordance with the LASAN sewage generation factor for residential categories, the base estimated sewer flows were based on the sewerage generation factors for residential categories.[58] The estimate was then adjusted to reflect the 20-percent water conservation mandate pursuant to the LA Green Building Code. The LA Green Building Code requires projects to achieve a 20-percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50-percent construction waste recycling levels. The HTP has a remaining capacity to treat 88 additional mgd and would have adequate capacity to serve the Proposed Project. Thus, the local sewer infrastructure is adequate to support the Proposed Project.

Impacts would less than significant.

57 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, *http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed March 2015.*

58 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewage Generation Factor for Residential and Commercial Categories (2012), http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf

Mitigation Measures: No mitigation measures are required.

c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. 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 described previously, the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site currently is and would continue to be collected on the site and directed towards existing storm drains in the Project vicinity. The Proposed Project will be required to demonstrate compliance with Low Impact Development (LID) Ordinance standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period. Thus, the rate of post-development runoff and pollutants from the parking area would be reduced under the Proposed Project. The Proposed Project would not create or contribute water runoff that would exceed the capacity of existing or planned stormwater drainage systems.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?

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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project build-out; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's Urban Water Management Plan (UWMP) projects yearly water demand to reach 641,622 acre-feet by year 2035 with passive and active water conservation, or an increase of 15-percent from year 2010 actual water demand.

As shown in **Table 4.17-1,** the Proposed Project's net increase for water demand would be approximately 6,600 gpd or 7.4 afy. The Proposed Project's net increase for water demand would represent less than approximately 0.01 percent of the City's total demand. As such, the Proposed Project would have a less than significant impact on water demand.

In addition, City efforts are underway to increase use of recycled water, expand capture of local stormwater runoff, and expand LADWP's water conservation programs to decrease reliance on purchased imported water for future demand. Short- and long-term conservation strategies include enforcing and expanding prohibited uses of water, increased use of recycled water, enhanced stormwater capture, extending outreach efforts, and encouraging regional conservation measures. The City plans to meet all future increases in water demand through a combination of local water supply development.

Finally, pursuant to LAMC Section 122.03(a), and as the Proposed Project is required to utilize water-saving devices including, but not limited to, high efficiency toilets, showerheads, and clothes washers; and urinals equipped with flush-o-meter valves, which flush with a maximum of 1.28 gallons. The Proposed Project would also comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures for landscaped areas.

Impacts would be less than significant.

Mitigation Measures: No mitigation meaures are required.

e. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in **Section 4.17 (b)**, the sewage flow will

ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Proposed Project.[59]

Impacts would less than significant.

Mitigation Measures: Mitigation measures are not required.

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. A significant impact may 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. Based on the *L.A. CEQA Thresholds Guide*, 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 (CiSWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

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, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Chiquita Canyon Landfill and the Manning Pit Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Chiquita Canyon Landfill currently has a remaining capacity of 3.97 million tons.[60] Chiquita Canyon Landfill has an estimated remaining life of 2 years. Although this is close to Project build-out, an

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59 City of Los Angeles, Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plan, website: *http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm, accessed March 2015.*

60 Los Angeles County Department of Public Works, 2012 Annual Report: Los Angeles Countywide Integrated Waste Management Plan (August 2013).

expansion of the Chiquita Canyon Landfill that would increase capacity by 23,872,000 tons (a 21-year life expectancy) is currently under proposal. Therefore, there would be no break in service, and Chiquita Canyon Landfill would be sufficiently able to serve the Proposed Project.

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. The solid waste disposal needs would be directed to the local recycling facilities and landfills described above. Based on a gross development size of 39,108 square feet of floor area and a standard waste generation rate of 4.38 pounds/square-foot, it is estimated that the construction of the Proposed Project would generate approximately 86 tons of debris during the construction process.[61]

As shown in **Table 4.17-3, Proposed Project Solid Waste Generation,** the Proposed Project's net generation during the life of the Proposed Project would be 294 pounds per day. This estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services and would only contract for waste disposal services with a company that recycles demolition and/or construction-related wastes. Prior to the issuance of any construction permit, the Applicant would provide a copy of the receipt or contract from a waste disposal company providing services to the Project, specifying recycled waste service(s), to the satisfaction of the Los Angeles Department of Building and Safety. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills. To facilitate on-site separation and recycling of construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

Table 4.17-3
Proposed Project Solid Waste Generation

Type of Use	Size	Waste Generation Rate[a] (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	24	12.23 lb./du/day	294
Total Project Waste Generation			**294**

61 United States Environmental Protection Agency (US EPA), Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, *Estimating 2003 Building-Related Construction and Demolition Materials Amount*, p. 8 (March 2009), http://www.epa.gov/epawaste/conserve/imr/cdm/pubs/cd-meas.pdf.

Notes:
lb. = pound; sq. =square feet; du = dwelling units
[a] *City of Los Angeles, L.A. CEQA Thresholds Guide (2006). Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

Additionally, the Proposed Project would be served by a third-party, private rubbish collector. The rubbish collector does not require separation of trash and recycling. Trash and recycled material is separated at the collector's processing facility.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Proposed Project would generate solid waste that is typical of residential buildings and would comply with all federal, State, and local statutes and regulations regarding proper disposal.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

Impact Analysis

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?

No Impact. A significant impact may occur only if the Proposed Project would have an identified potentially significant impact for any of the cited issues. The Proposed Project is located in a densely populated urban area and would have less than significant impacts with respect to biological resources provided the mitigation measures listed previously are implemented and less than significant cultural resource impacts provided the mitigation measures listed previously are implemented. The Proposed Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

No impact would occur.

Mitigation Measures: No mitigation measures are required.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The Proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, 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 and traffic, and utilities would be less than significant.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Project Mitigation. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures stated from **Section 4.1** to **Section 4.17.**

Impacts would be less than significant with mitigation incorporated.

Mitigation Measures: Applicable mitigation measures stated from **Section 4.1** to **Section 4.17** would be required.

5.0 REFERENCES

The following documents and information were used in the preparation of this Negative Declaration:

Air Quality Management District (AQMD). *Final 2012 Air Quality Management Plan*. http://www.aqmd.gov/aqmp/2012aqmp/Final/index.html.

California Air Resources Board. *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED)*, Attachment D, page 11. August 19, 2011.

California Department of Conservation. Division of Land Resource Protection. *Los Angeles County Important Farmland 2010*. January 2011. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf.

California Department of Conservation. Division of Land Resource Protection. The Land Conservation (Williamson) Act. 2013. http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx.

California Department of Fish and Game Code, Section 3503.

California Department of Transportation (Caltrans). District 7. District 7 Projects. 2007. http://www.dot.ca.gov/dist07/travel/projects/details.php?id=6.

California Department of Transportation. Transportation- and Construction-Induced Vibration Guidance Manual. June 2004.

City of Los Angeles. L.A. CEQA Thresholds Guide. 2006.

City of Los Angeles. *Los Angeles Tree Ordinance* (No. 177404). *LAMC*, sec. 12.21.

City of Los Angeles. Parking Requirements. *LAMC*, sec. 12.21 A.4.

City of Los Angeles. Special Zoning Classification. T Classification. *LAMC*, sec. 12.32(g)(1).

City of Los Angeles. Zoning Information (ZI), (No. 2426), Freeway Adjacent Advisory Notice for Sensitive Uses, Tentative Tract Map, *LAMC*, sec. 17.06.

City of Los Angeles Department of City Planning. *Avenue 57 Transit Oriented District*. Section 2, Purposes. 2002. http://cityplanning.lacity.org/complan/specplan/pdf/AVE57TOD.PDF.

City of Los Angeles Department of City Planning. Northeast Los Angeles Community Plan. 1999. http://cityplanning.lacity.org/complan/pdf/nlacptxt.pdf.

City of Los Angeles Department of City Planning. Parcel Profile Reports. Zoning Information and Map Access System (ZIMAS). http://www.zimas.lacity.org.

City of Los Angeles Department of Public Works. Bureau of Sanitation. Hyperion Treatment Plant. http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

City of Los Angeles Department of Public Works. Bureau of Sanitation. Sewer Generation Factor for Residential and Commercial Categories. (2012). http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.

City of Los Angeles Department of Public Works. Mineral Resources and Oil Fields in East Los Angeles County. Los Angeles County Bicycle Master Plan Draft PEIR. January 2012.

City of Los Angeles Department of Public Works. *City of Los Angeles Urban Water Management Plan*. 2011.

City of Los Angeles General Plan. 2002.

City of Los Angeles General Plan. Housing Element (Objective 4.2).

City of Los Angeles General Plan. Land Use Element (Goal 3k; Policy 3.15.3).

City of Los Angeles General Plan. Land Use Element (Objective 3.1).

City of Los Angeles General Plan. Land Use Element (Objective 3.16, 3.8; Policy 3.15.4).

City of Los Angeles General Plan. Land Use Element (Objective 3.4; Policy 3.4.1).

City of Los Angeles General Plan. Safety Element (1990).

City of Los Angeles General Plan. Service Systems Element.

City of Los Angeles General Plan. Transportation Element (Policy 3.5, Policy 3.12).

Code of Federal Regulations. Title 50, Part 10.

County of Los Angeles Department of Public Works. *2012 Annual Report, Los Angeles Countywide Integrated Waste Management Plan*. August 2013.

Crain and Associates. Williams Homes Residential Project Trip Generation Assessment 5107-5123 Echo Street, City of Los Angeles. December 11, 2014.

EEG Services. Phase I Environmental Site Assessment, Vacant Property, 5107-5123 Echo Street, Los Angeles, California 90042. August 22, 2014.

Federal Transit Administration. *Transit Noise and Vibration Impact Assessment.* May 2006.

GeoConcepts Inc. Preliminary Geotechnical Engineering Investigation. Proposed Three-Story Townhomes, PM 3298, Lot B, 5123 Echo Street, Los Angeles, California. September 14, 2014..

Los Angeles County Department of Public Works. Los Angeles County Storm Drain System. http://dpw.lacounty.gov/fcd/stormdrain/index.cfm.

Los Angeles Department of City Planning Demographic Research Unit. Statistical Information. Local Population and Housing Estimates. http://cityplanning.lacity.org/DRU/HomeLocl.cfm.

Los Angeles Unified School District. School Facilities Needs Analysis. September 2012.

South Coast Air Quality Management District. *Final Localized Significance Threshold Methodology*. June 2003. Revised July 2008.

Southern California Association of Governments (SCAG). *Regional Transportation Plan 2012-2035 Sustainable Communities Strategy*. April 2012.

Southern California Association of Governments, *2008 Regional Comprehensive Plan*. 2008.

Southern California Association of Governments. *Compass Growth Vision*. 2004.

United States Code. Title 33. Section 703 et seq.

Urban Land Institute. *The Role Compact Development Can Play in Reducing Green House Gas Emissions, Evidence from Three Recent Studies.* 2010.

United States Environmental Protection Agency (US EPA), Office of Resource Conservation and Recovery. Report No. EPA530-R-09-002. *Estimating 2003 Building-Related Construction and Demolition Materials Amount*. p. 8. March 2009. http://www.epa.gov/epawaste/conserve/imr/cdm/pubs/cd-meas.pdf.

Wildscape Restoration. Williams Homes Echo Street Project Tree Survey Report. January 28, 2015.

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