CITY OF LOS ANGELES
OFFICE OF THE CITY
CLERK ROOM 395,
CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY

| LEAD CITY AGENCY | COUNCIL DISTRICT |
|---|---|
| City of Los Angeles | 10 |
| **PROJECT TITLE**<br>3545 Wilshire Boulevard Project | **CASE NO.**<br>CPC-2016-341-VZC-ZAA-SPR<br>ENV-2016-343-MND |

**PROJECT LOCATION**
3539, 3541, 3543, 3545, 3547, 3549, 3551 West Wilshire Boulevard and 601, 611, 619, 627, 637, 645 South Ardmore Avenue, Los Angeles, CA 90010

**PROJECT DESCRIPTION**

The Project includes demolition and removal of the existing structures and parking areas at the Project site and development of the site with an approximately 513,732-square-foot mixed-use building, including 482,043 square feet of multi-family residential dwelling units (428 units), retail land uses (31,689 square feet), and parking (864 vehicle parking spaces, 652 bicycle parking spaces). The Project includes two high-rise residential buildings – a 32story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. The area between the two residential buildings would be developed with a six-level parking structure, including one on-grade level and 5 levels above the ground-floor retail, reaching approximately 81 feet in height as measured from the lowest point on the Project site. In order to implement the Project, the Project Applicant is requesting the following approvals from the City: 1) Vesting Zone Change from C2-2, C4-2, P-2, and R5-2 to C4-2, pursuant to LAMC Section 12.32.Q; 2) Vesting Tentative Tract Map (Tract No. 73981) to merge the land into a single ground lot, with 7 airspace lots, to facilitate the creation of a mixed-use development consisting of approximately 428 residential condominiums, with approximately 31,689 square feet of commercial space, pursuant to LAMC Section 17.01; 3) Zero-foot side yard for the parking structure west elevation, at levels 2-6, in lieu of the 16 feet otherwise required by the structure's inclusion of residential parking, pursuant to LAMC Section 12.28; and 4) Site Plan Review for the Project that would result in an increase of more than 50 dwelling units, pursuant to LAMC Section 16.05.

**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY**

3545 Wilshire, LLC
3470 Wilshire Boulevard, Suite 700
Los Angeles, CA 90010

**FINDING:**

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

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-make 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 THIS FORM | TITLE | TELEPHONE NUMBER |
|---|---|---|
| May Sirinopwongsagon | City Planner | 213-978-1372 |

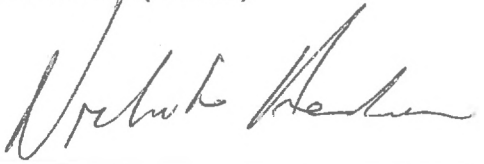
| ADDRESS | SIGNATURE (Official) | DATE |
|---|---|---|
| 200 N. SPRING STREET, 6th FLOOR<br>LOS ANGELES, CA. 90012 |  | OCTOBER 19, 2016 |



**EXHIBIT D**

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## APPENDICES

# I. INTRODUCTION

## Introduction

The subject of this Initial Study is the demolition and removal of the existing structures and parking areas at the Project site and development of the site with an approximately 513,732-square-foot mixed-use building, including 482,043 square feet of multi-family residential dwelling units (428 units), retail land uses (31,689 square feet), and parking (864 vehicle parking spaces, 652 bicycle parking spaces). The Project includes two high-rise residential buildings – a 32-story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. The area between the two residential buildings would be developed with a six-level parking structure, including one on-grade level and 5 levels above the ground-floor retail, reaching approximately 81 feet in height as measured from the lowest point on the Project site. In order to implement the Project, the Project Applicant is requesting the following approvals from the City: 1) Vesting Zone Change from C2-2, C4-2, P-2, and R5-2 to C4-2, pursuant to LAMC Section 12.32.Q; 2) Vesting Tentative Tract Map (Tract No. 73981) to merge the land into a single ground lot, with 7 airspace lots, to facilitate the creation of a mixed-use development consisting of approximately 428 residential condominiums, with approximately 31,689 square feet of commercial space, pursuant to LAMC Section 17.01; 3) Zero-foot side yard for the parking structure west elevation, at levels 2-6, in lieu of the 16 feet otherwise required by the structure's inclusion of residential parking, pursuant to LAMC Section 12.28; and 4) Site Plan Review for the Project that would result in an increase of more than 50 dwelling units, pursuant to LAMC Section 16.05. The Project site is located in the Wilshire Community Plan Area of the City of Los Angeles (the "City"). The Project Applicant is 3545 Wilshire, LLC. A more detailed description of the Project is contained in Section II (Project Description). The City's Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

## Project Information

| | |
|---|---|
| Project Title: | 3545 Wilshire Boulevard Project |
| Project Location: | 3539, 3541, 3543, 3545, 3547, 3549, 3551 West Wilshire Boulevard and 601, 611, 619, 627, 637, 645 South Ardmore Avenue, Los Angeles, CA 90010 |
| Lead Agency: | City of Los Angeles Department of City Planning |
| City Contact Person: | May Sirinopwongsagon, City Planner, (213) 978-1372 |

**Organization of Initial Study**

This Draft Initial Study is organized into six sections as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

Project Description: This section provides a detailed description of the environmental setting and the Project, including Project characteristics and environmental setting.

Initial Study Checklist and Impact Analysis: This section contains the completed Initial Study Checklist and an assessment and discussion of each environmental issue identified in the Checklist. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to less-than-significant levels.

Preparers of Initial Study and Persons Consulted: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the Initial Study.

# II. PROJECT DESCRIPTION

## ENVIRONMENTAL SETTING

### Project Site

The 1.99-acre Project site is located in the Wilshire Community Plan Area of the City of Los Angeles (the "City"). Regional access to the Project site is provided via U.S. Highway 101 (the "Hollywood Freeway") and Interstate 110 (the "Harbor Freeway"). The Project site is located at 3545 Wilshire Boulevard and comprises assessor's parcel numbers (APNs) 550-302-5012, 550-302-5004, and 550-302-5014. The Project site is bound by Wilshire Boulevard to the south, Ardmore Avenue to the east, 6th Street to the north, and two restaurants, a surface parking lot, and a pre-/kindergarten school to the west. The Project site is currently developed with a 67,733-square-foot medical office, an 11,470-square-foot commercial/retail building, and surface parking areas. The Project site location is shown on Figures II-1 and II-2. Views of the Project site are shown on Figures II-3 and II-4.

### Description of Surrounding Area

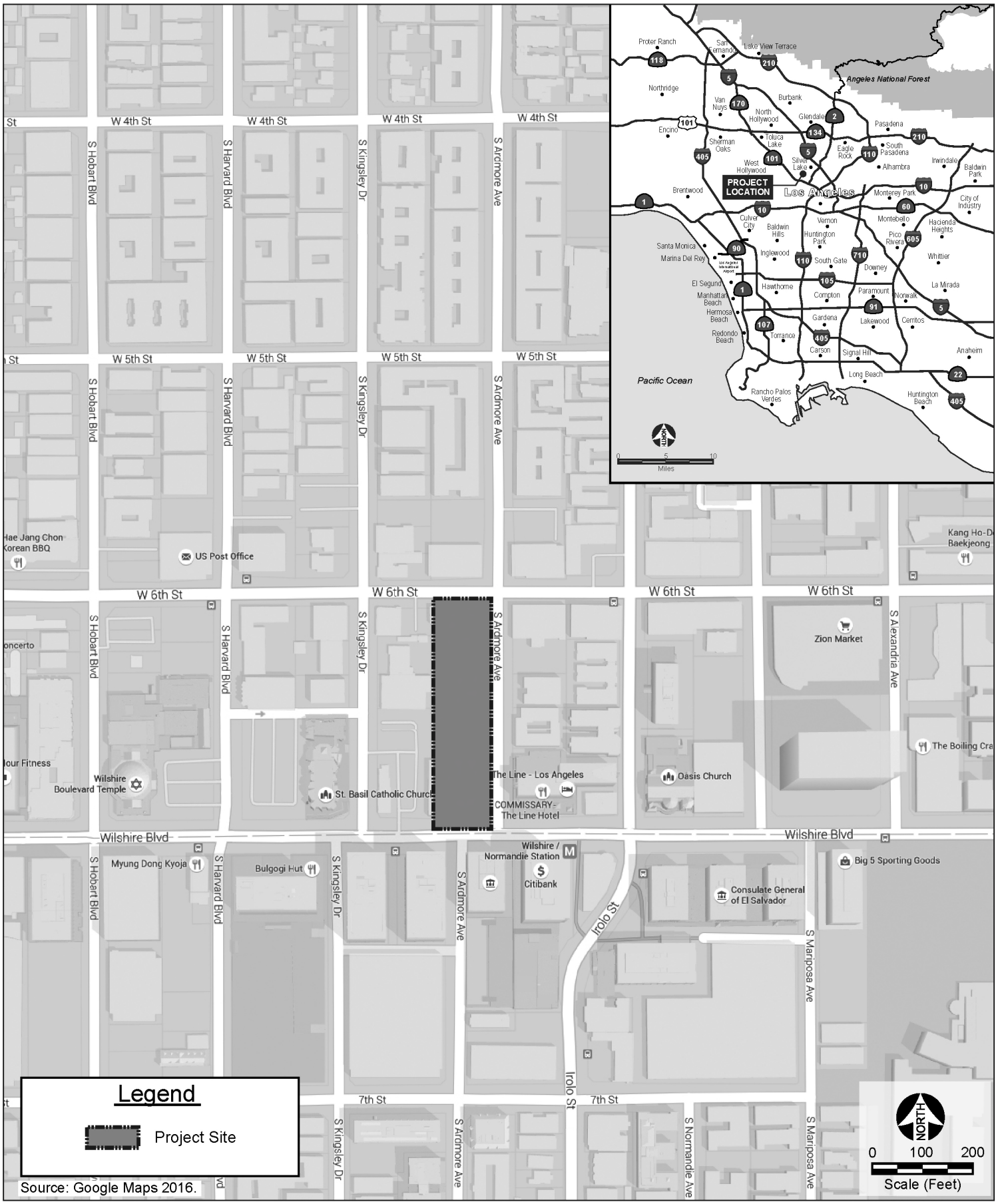
Existing land uses surrounding the Project site include commercial to the south; commercial and multi-family residential to the east; commercial to the north; and commercial, institutional, and parking to the west. The Wilshire/Normandie Metro Station is located approximately 300 feet to the southeast of the Project site on Wilshire Boulevard. Views of the areas surrounding the Project site are shown on Figures II-5 and II-6.

### Land Use Designation & Zoning

The Project site is zoned C4-2 (Commercial Zone, Height District 2), C2-2 (Commercial Zone, Height District 2), R5-2 (Multiple Dwelling Zone, Height District 2), and P-2 (Automobile Parking Zone, Height District 2), with a land use designation of Regional Center Commercial. The existing zoning and land use designation for the Project site are shown on Figures II-7 and II-8, respectively.

## PROJECT CHARACTERISTICS

The Project includes demolition and removal of the existing structures and parking areas at the Project site and development of the site with an approximately 513,732-square-foot mixed-use building, including 482,043 square feet of multi-family residential dwelling units, retail land uses, and parking (refer to Figures II-8 through II-23). The Project includes two high-rise residential buildings – a 32-story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. The residential buildings would include a total of 428 dwelling units - 7 studios, 125 one-




CAJA Environmental Services, LLC

Figure II-1
Project Site and Local Map


CAJA Environmental Services, LLC

Figure II-2
Aerial Photo of the Project Site

**Photo A:** View southwest of existing restaurant building on the Project site.

**Photo B:** View toward the south of the Project site. Building on the right to be demolished.

**Photo C:** View southwest of the Project site.

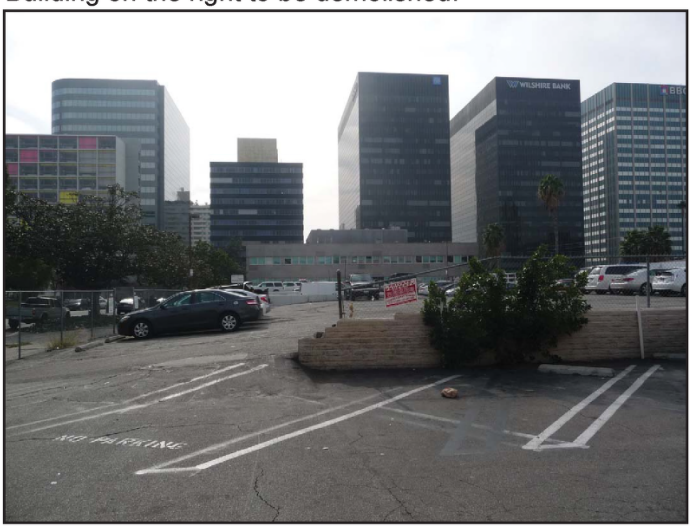


**Photo D:** View south of the Project site.

**Photo E:** View west of the northern portion of the Project site.

**Photo F:** View south of the Project site.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-3
Views of the Project Site

**Photo G:** View east from the southern portion of the Project site. Building on right to be deomlished.

**Photo H:** View northeast of the Project site.

**Photo I:** View north of the Project site.

**Photo J:** View west of the Project site.

**Photo K:** View northwest of the Project site.

**Photo L:** View north of the Project site.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-4
Views of the Project Site

**Photo A:** Looking northwest at medical office building on the corner of Ardmore Ave. and 6th St. across from the Project site.

**Photo B:** Looking southeast at the Public Counsel building on the corner of Ardmore Ave. and 6th St. across from the Project site.

**Photo C:** Looking south at residential and hotel uses along Ardmore Ave. across from Project site.

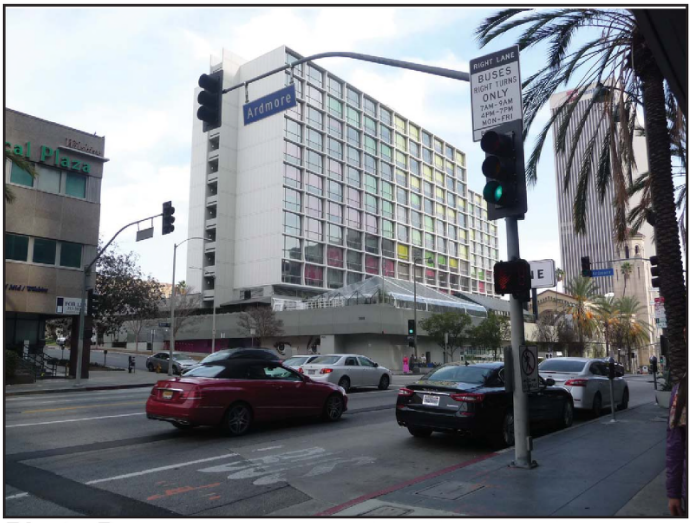



**Photo D:** Looking northeast at The Line Hotel along Wilshire Blvd. across from the Project site.

**Photo E:** Looking west at office buildings along Wilshire Blvd. across from Project site.

**Photo F:** Looking northwest at St. Basil Catholic Church on the corner of Wilshire Blvd. and Kingsley Dr.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-5
Views of the Surrounding Uses


**Photo G:** Looking north at restaurant adjacent to the Project site on the corner of Wilshire Blvd. and Kingsley Dr.

**Photo H:** Looking northwest at office buildings along Kingsley Dr.

**Photo I:** Looking east along Kingsley Dr. at restaurant parking lot and office building adjacent to the Project site.


**Photo J:** Looking east along Kingsley Dr. at office building adjacent to the Project site.


**Photo K:** Looking northeast along Kingsley Drive at Lily Preschool and restaurant adjacent to the Project site.

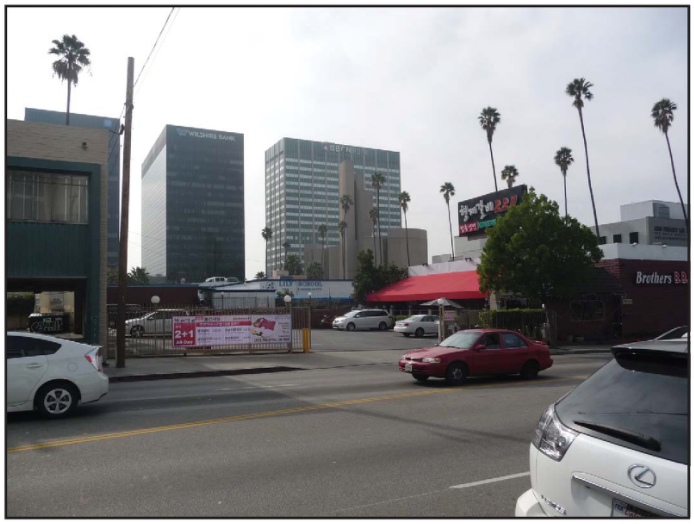
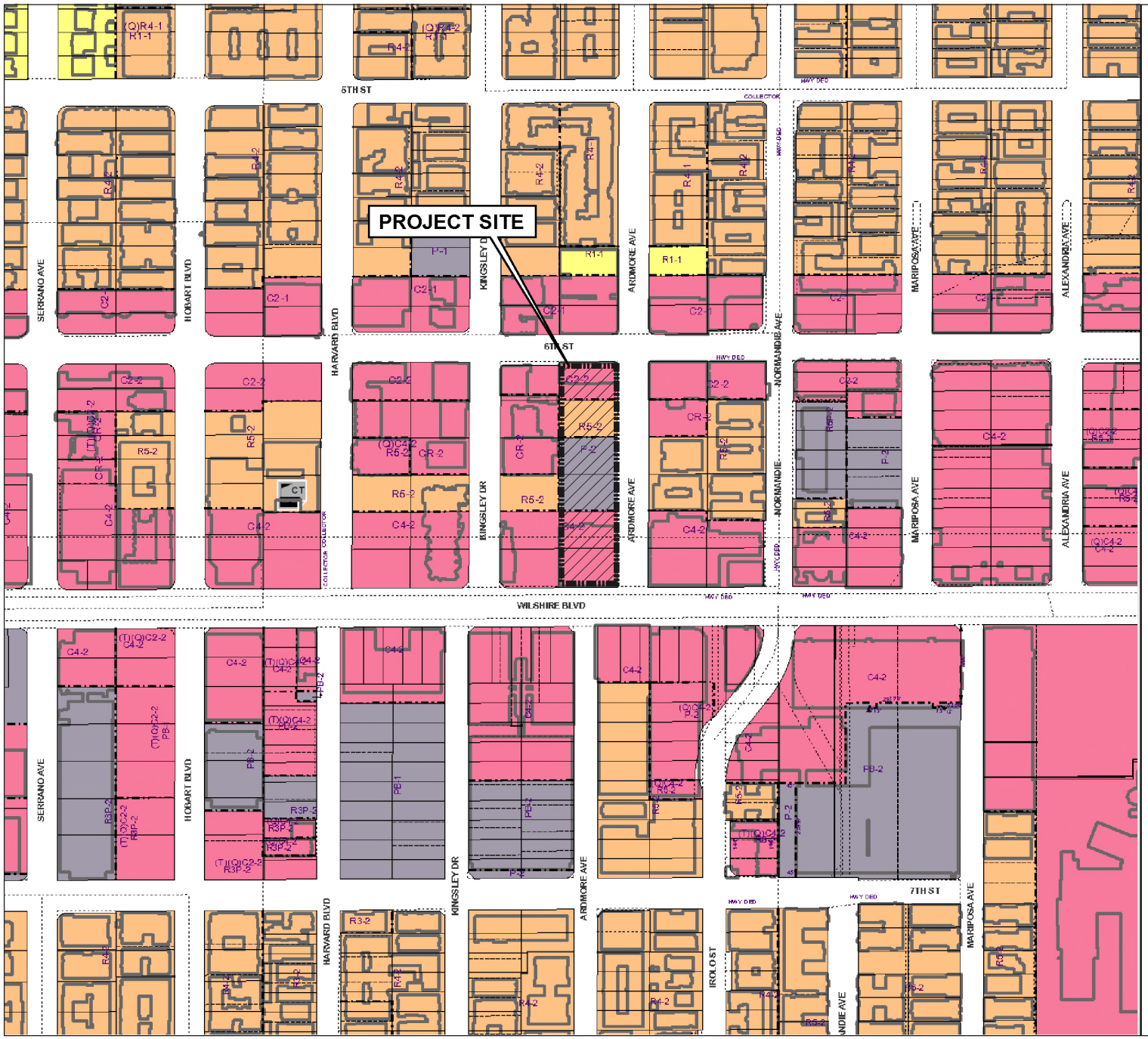


**Photo L:** Looking southwest along 6th St. at restaurant and connecting parking lot adjacent to the Project site.

Source: CAJA Environmental Services LLC, 2016.

CAJA Environmental Services, LLC

Figure II-6
Views of the Surrounding Uses




## Legend

**GENERALIZED ZONING**

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF
- HILLSIDE
- CT Charter School

NORTH

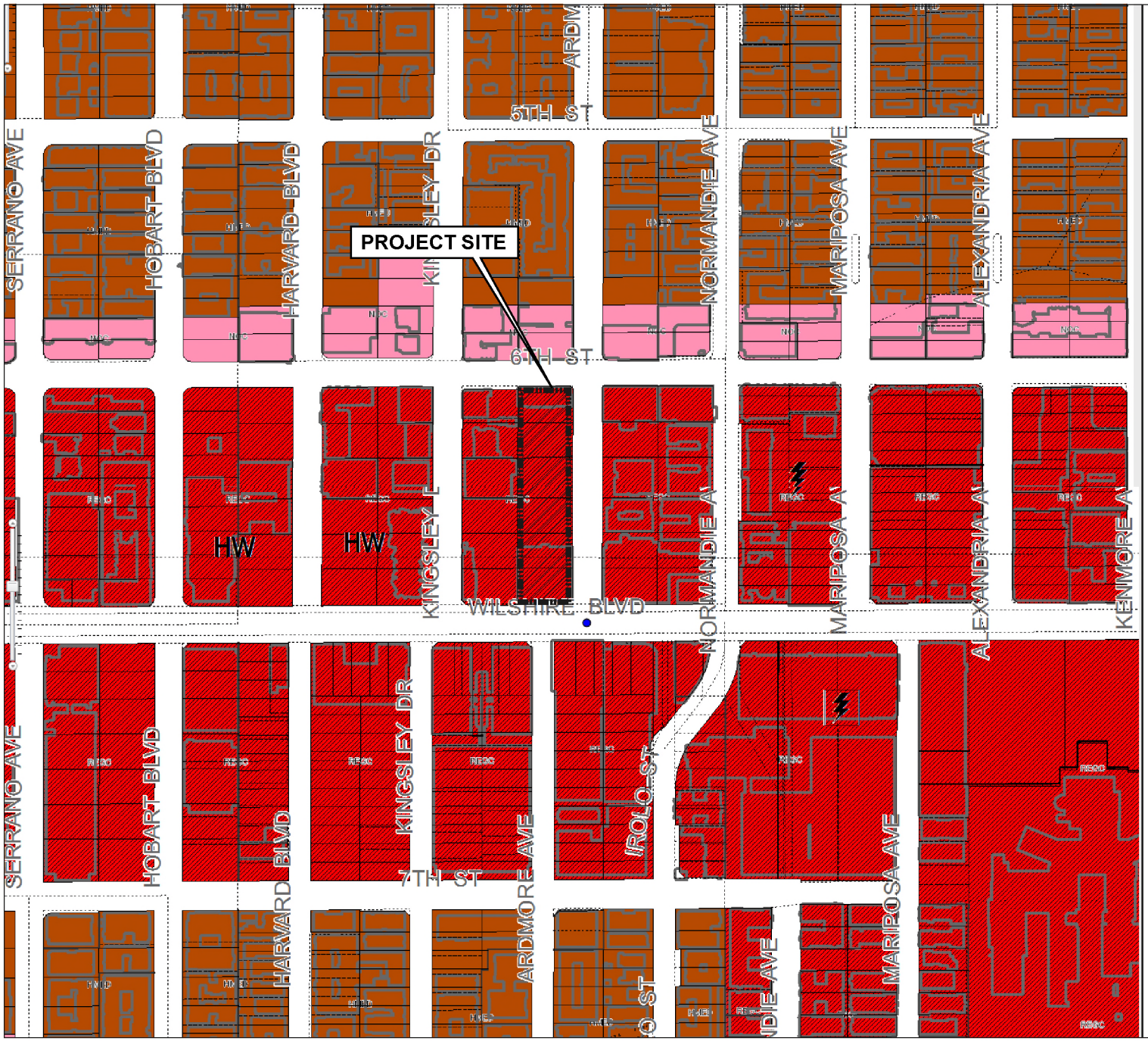
0 200 400

Scale (Feet)

Source: Zimas 2016.

CAJA Environmental Services, LLC

Figure II-7
Existing Zoning




## Legend

**GENERAL PLAN LAND USE**

**LAND USE**

**RESIDENTIAL**

- High Medium Residential

**COMMERCIAL**

- Neighborhood Office Commercial
- Regional Center Commercial
- HW Church
- Power Distribution Station

NORTH

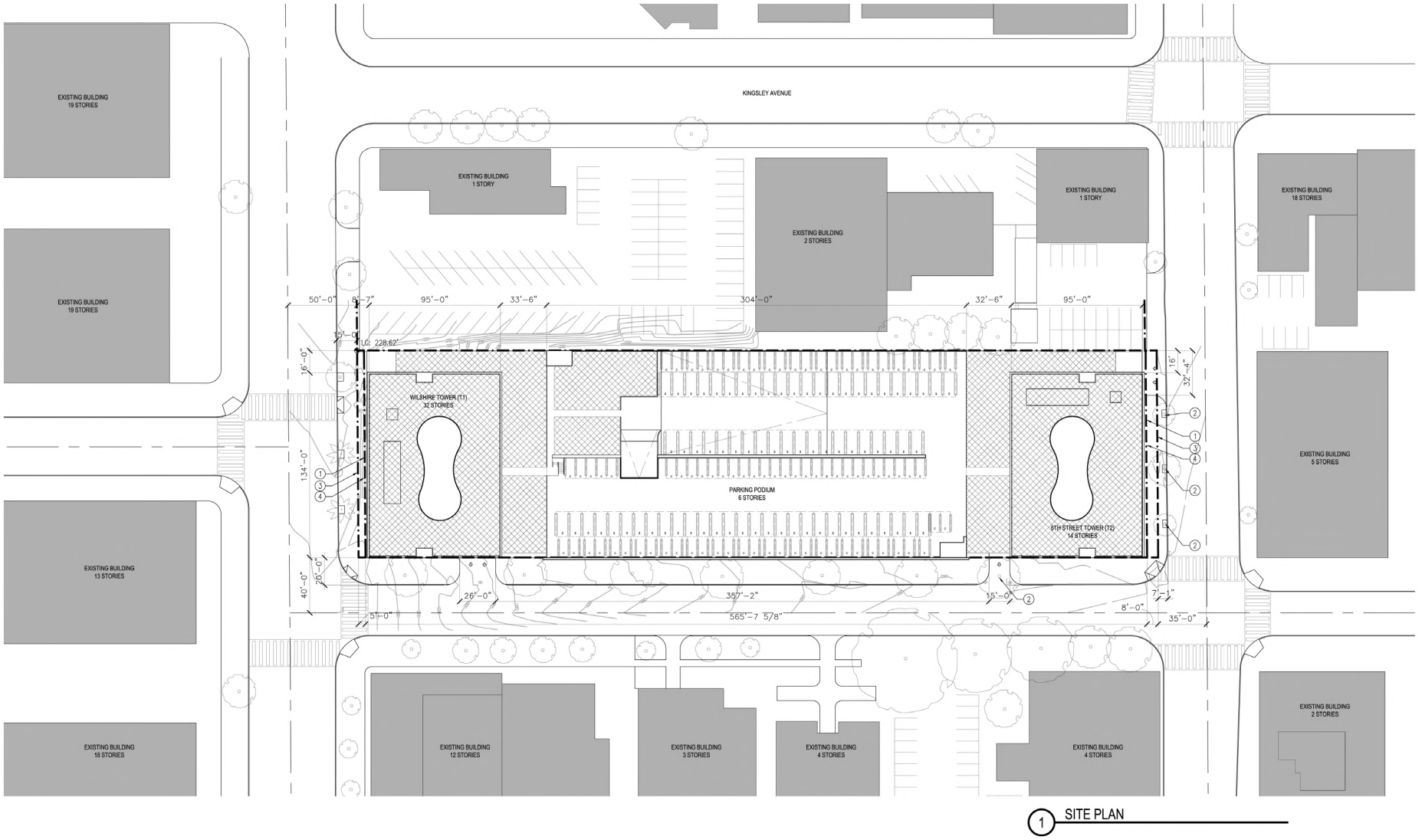
0 200 400

Scale (Feet)

Source: Zimas 2016.

CAJA Environmental Services, LLC

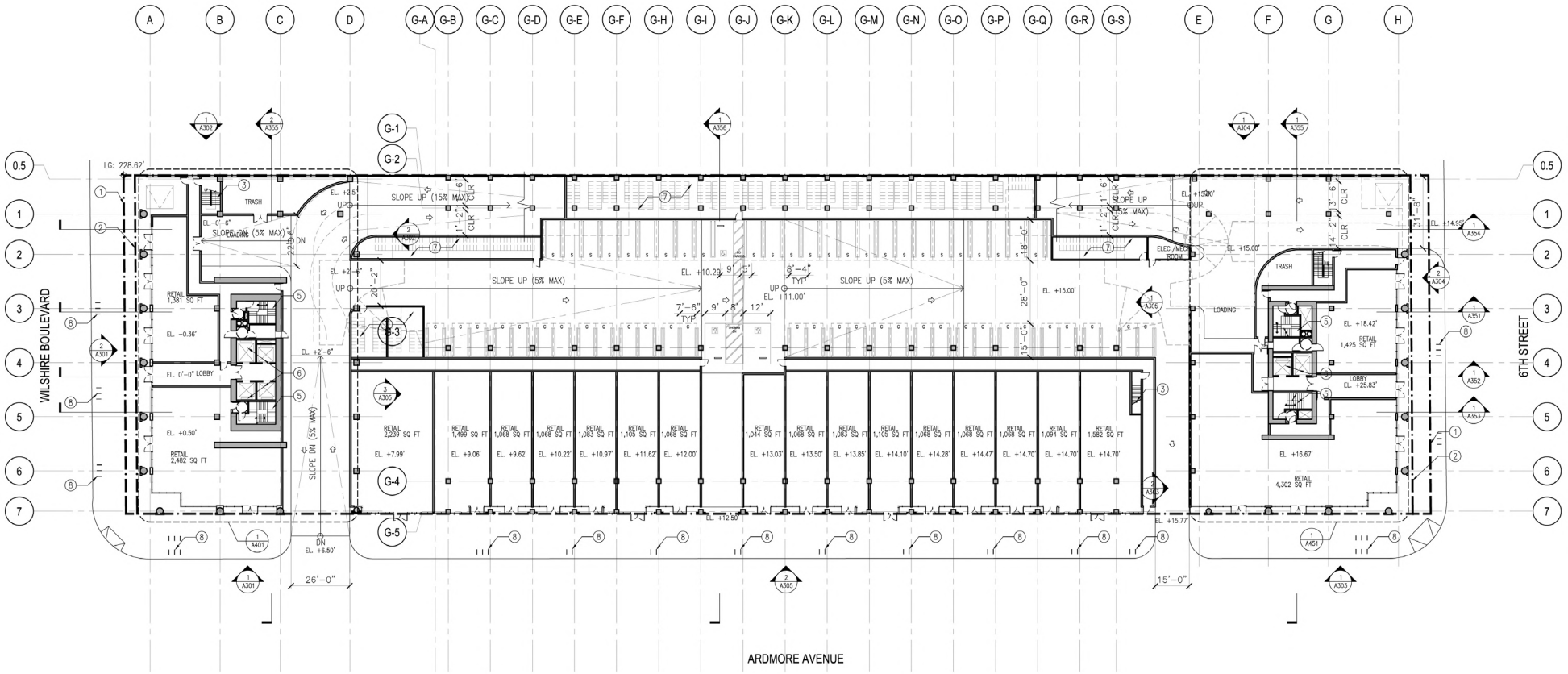
Figure II-8
Existing Land Use Designation




Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-9
Plot Plan




1 GROUND LEVEL PLAN

LEGEND:

PROPERTY LINE

KEYNOTES:

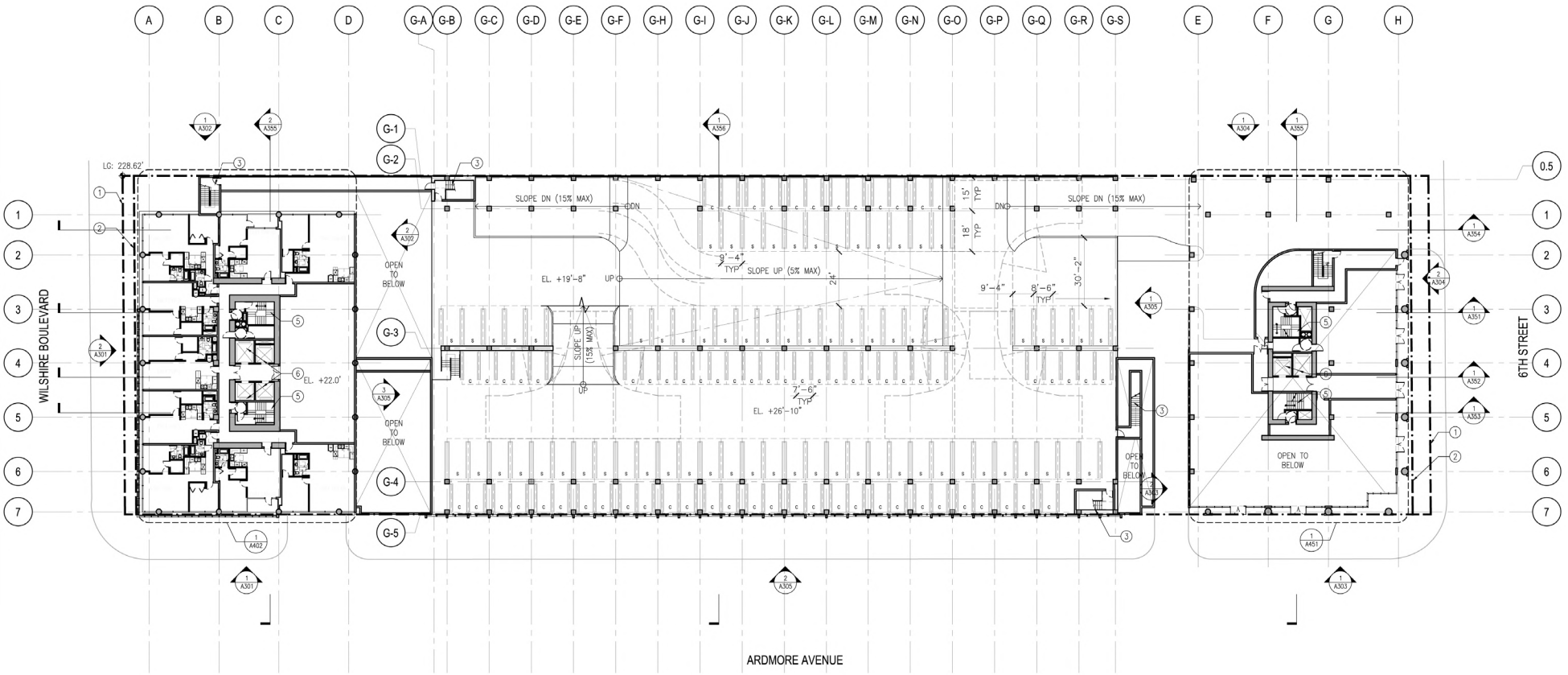
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-10
Ground Level Plan




1 SECOND LEVEL PLAN

LEGEND:

PROPERTY LINE

KEYNOTES:

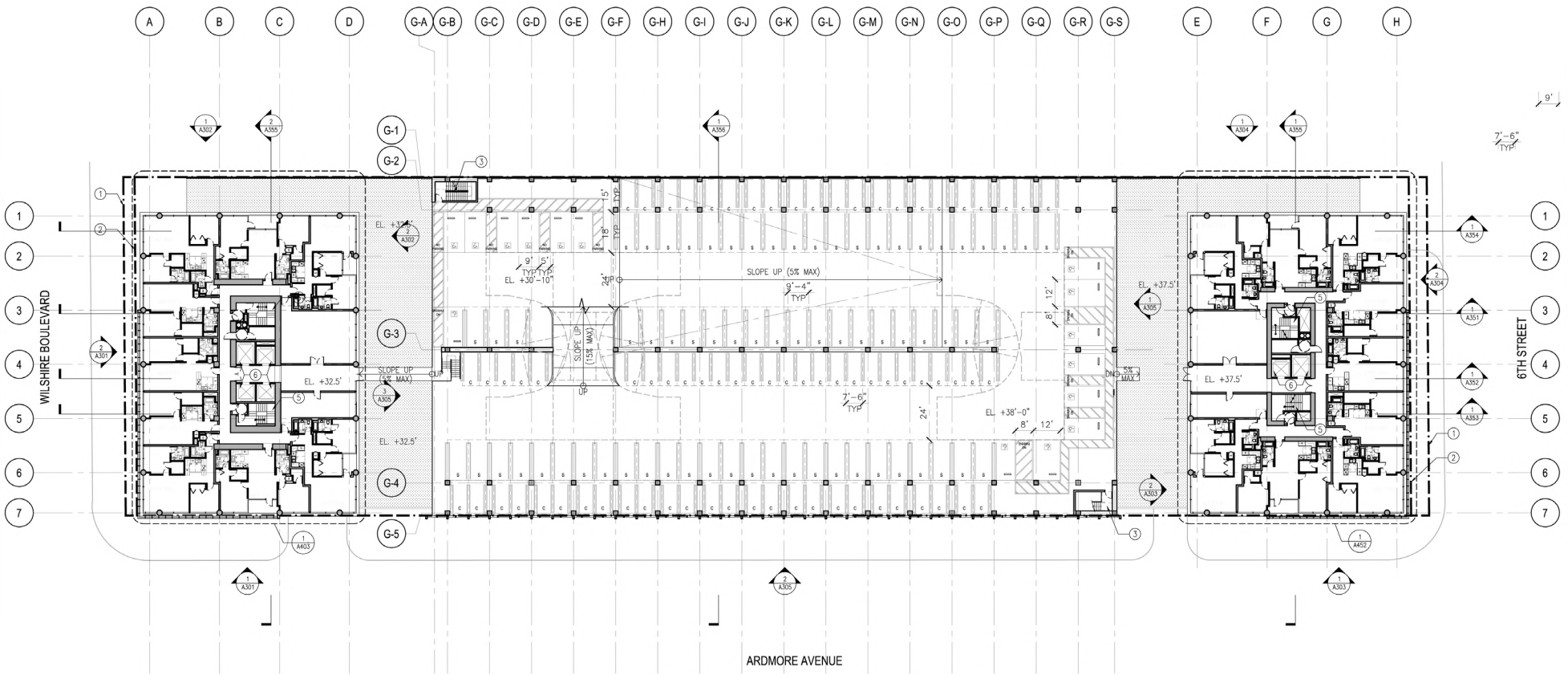
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-11
Second Level Plan




1 THIRD LEVEL PLAN

LEGEND:

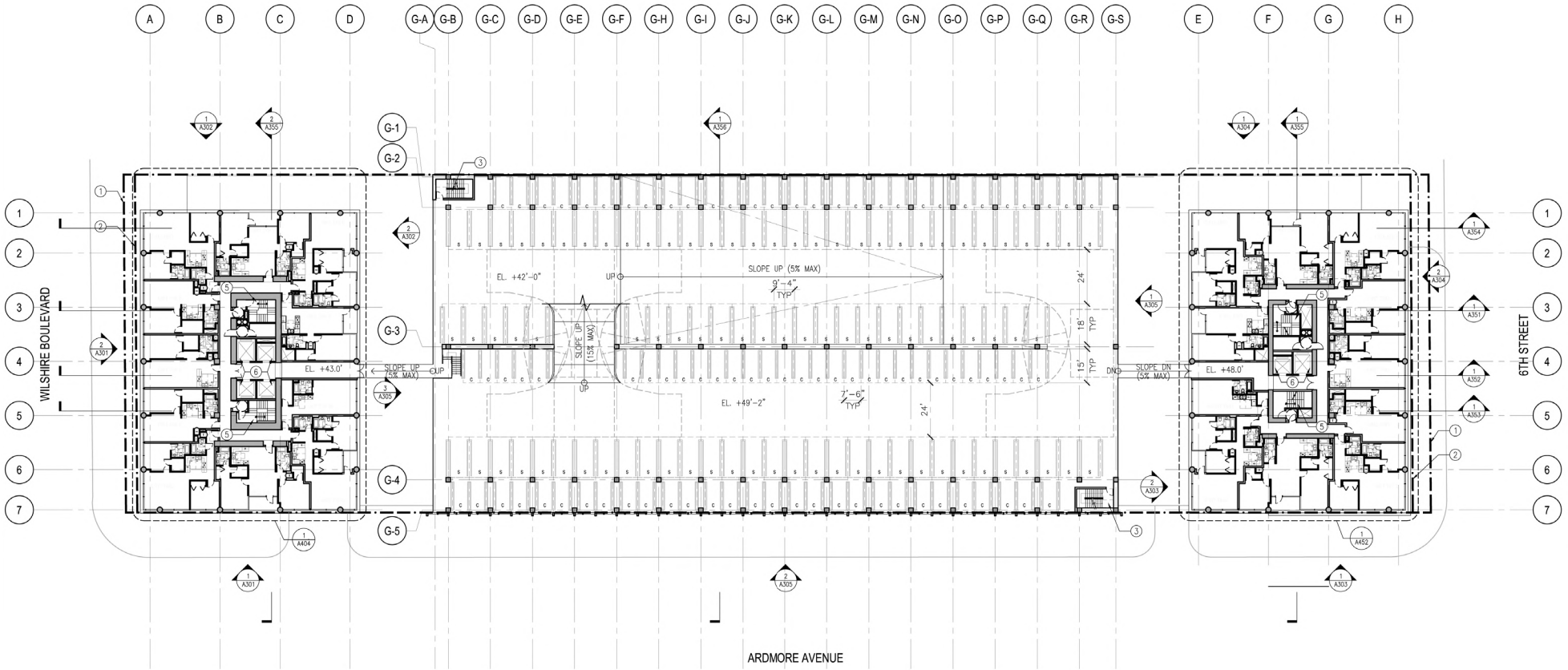
- PROPERTY LINE
- COMMON OPEN SPACE

KEYNOTES:

NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.




1 FOURTH LEVEL PLAN

LEGEND:

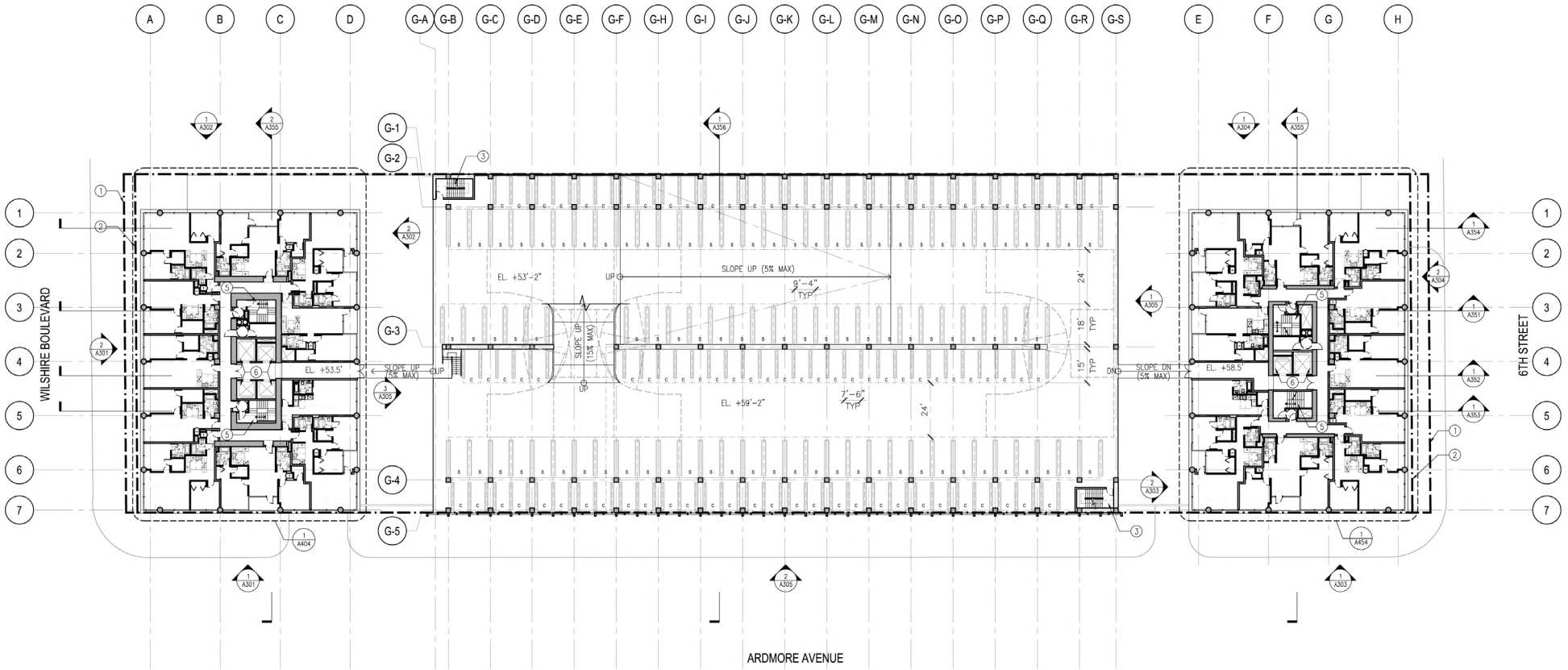
PROPERTY LINE

KEYNOTES:

NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.




1 FIFTH LEVEL PLAN

LEGEND:

PROPERTY LINE

KEYNOTES:

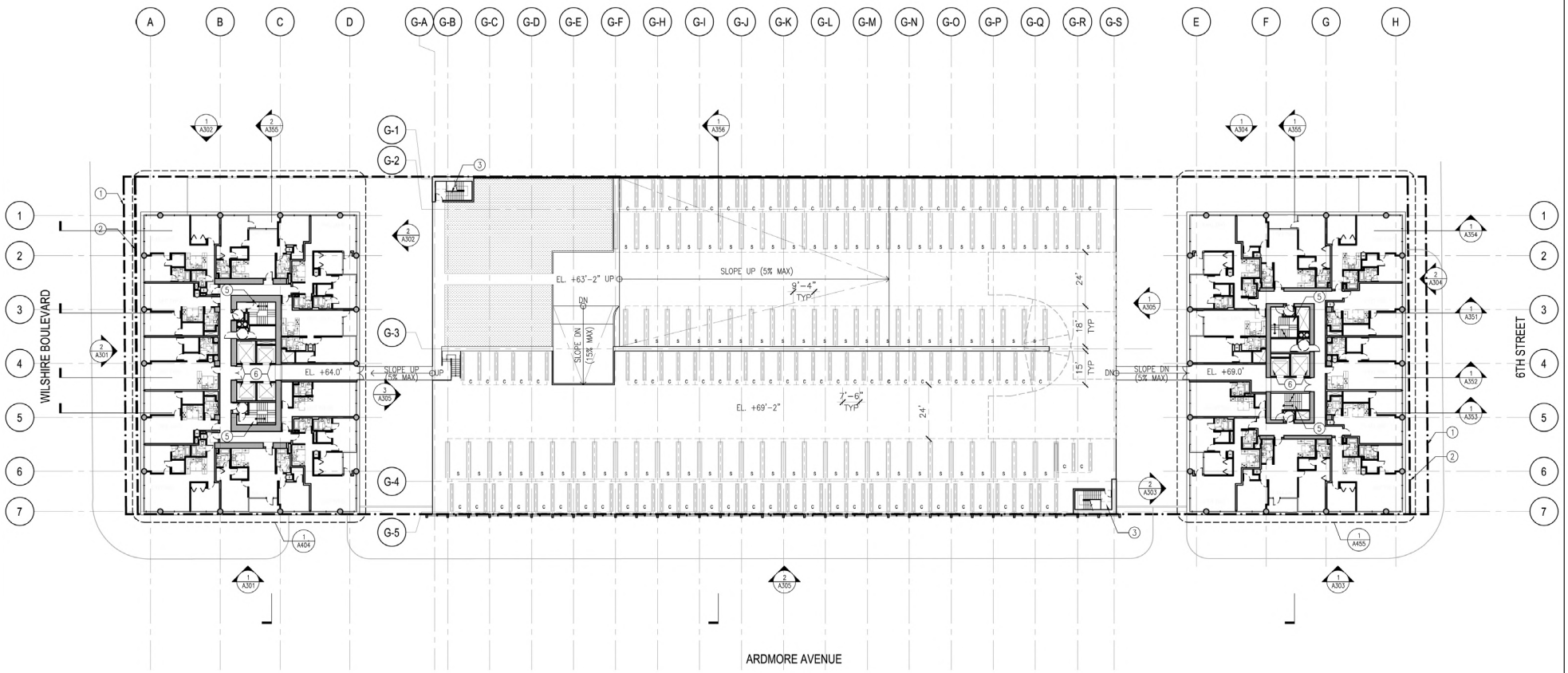
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-14
Fifth Level Plan




1 SIXTH LEVEL PLAN

LEGEND:

PROPERTY LINE

KEYNOTES:

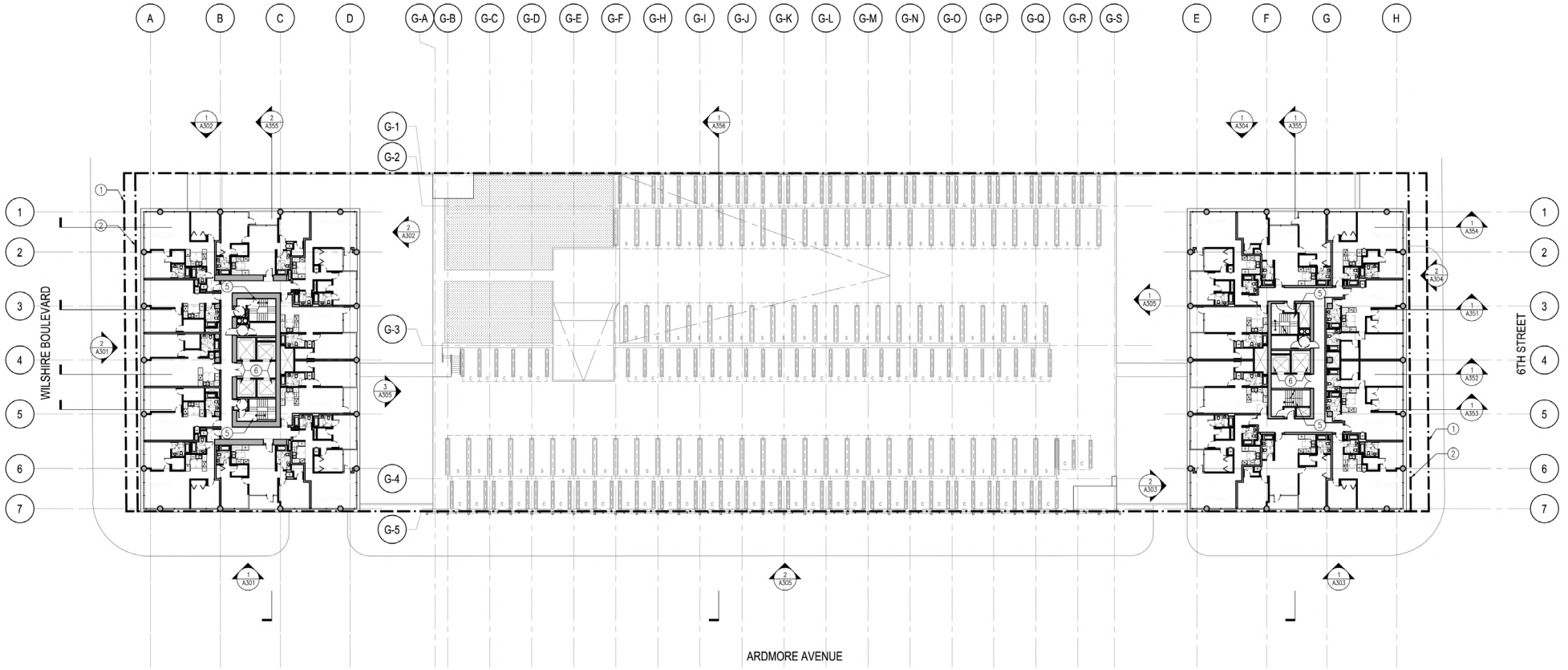
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-15
Sixth Level Plan




1 TYPICAL OVERALL PLAN

LEGEND:

PROPERTY LINE

COMMON OPEN SPACE

KEYNOTES:

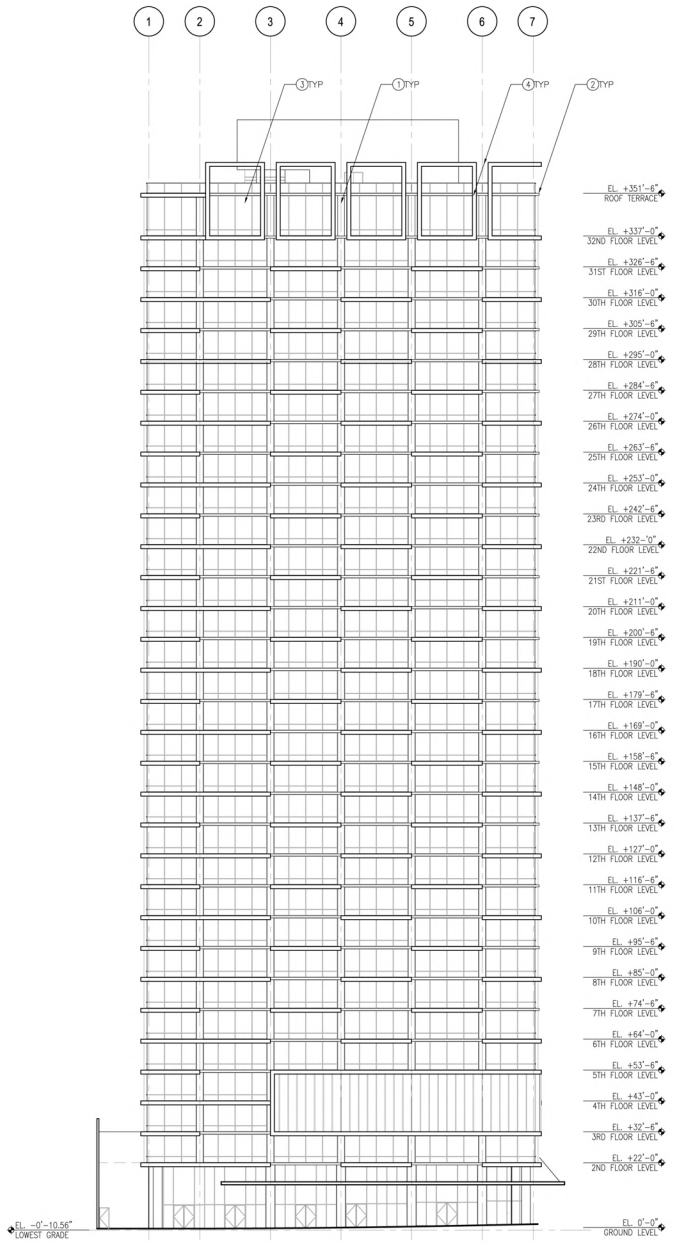
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. PROPERTY LINE BEFORE DEDICATION
2. PROPERTY LINE AFTER DEDICATION
3. GARAGE EXIT STAIR
4. GARAGE ELEVATOR
5. BUILDING EXIT STAIR
6. BUILDING ELEVATOR
7. LONG-TERM BIKE PARKING
8. SHORT-TERM BIKE PARKING

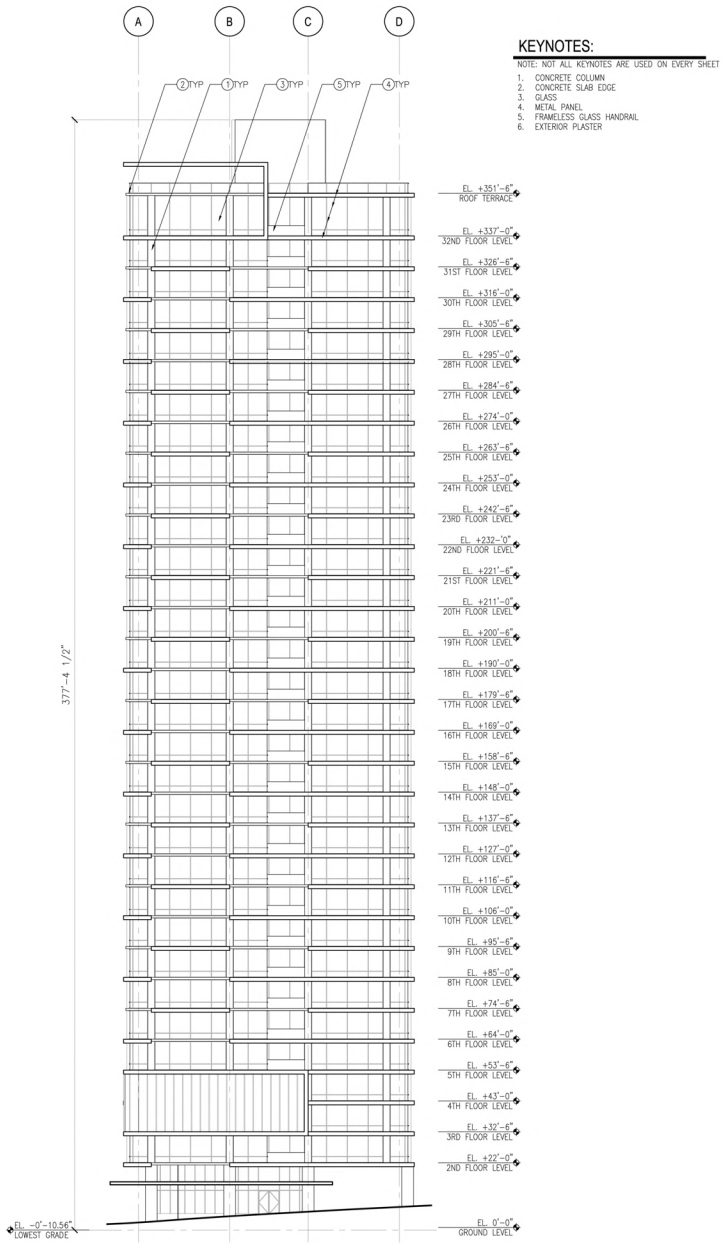
Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-16
Typical Overall Plan




2 EXTERIOR ELEVATION - SOUTH




1 EXTERIOR ELEVATION - EAST

**KEYNOTES:**

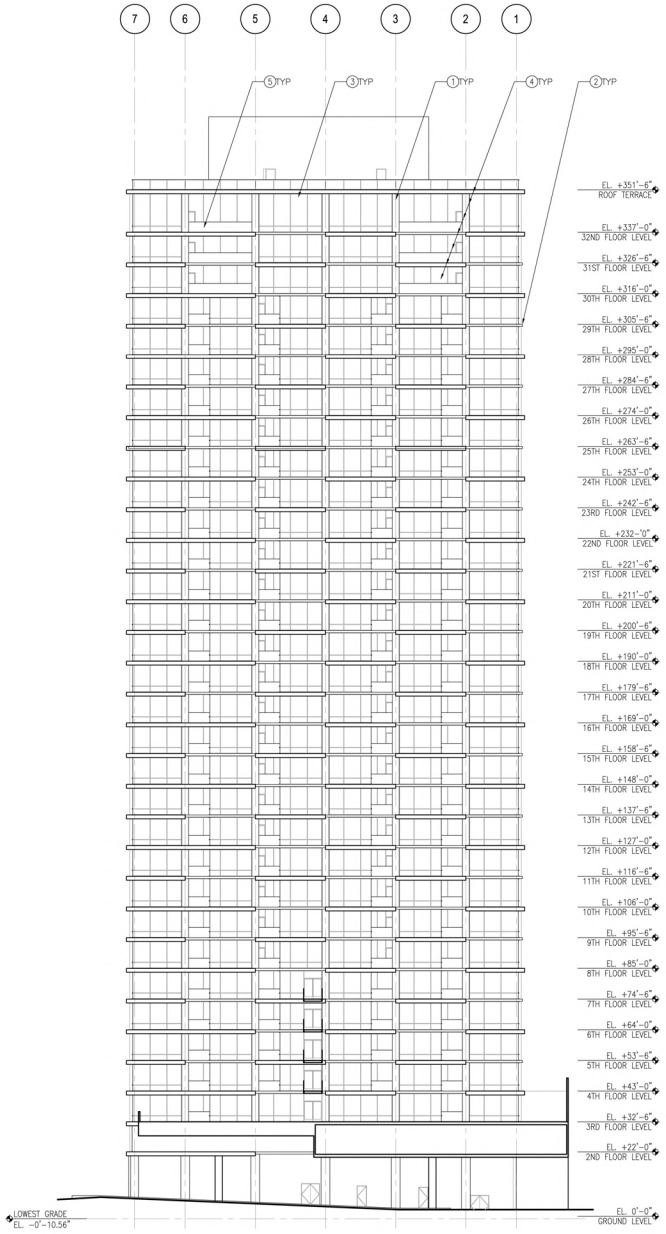
NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. CONCRETE COLUMN
2. CONCRETE SLAB EDGE
3. GLASS
4. METAL PANEL
5. FRAMELESS GLASS HANDRAIL
6. EXTERIOR PLASTER

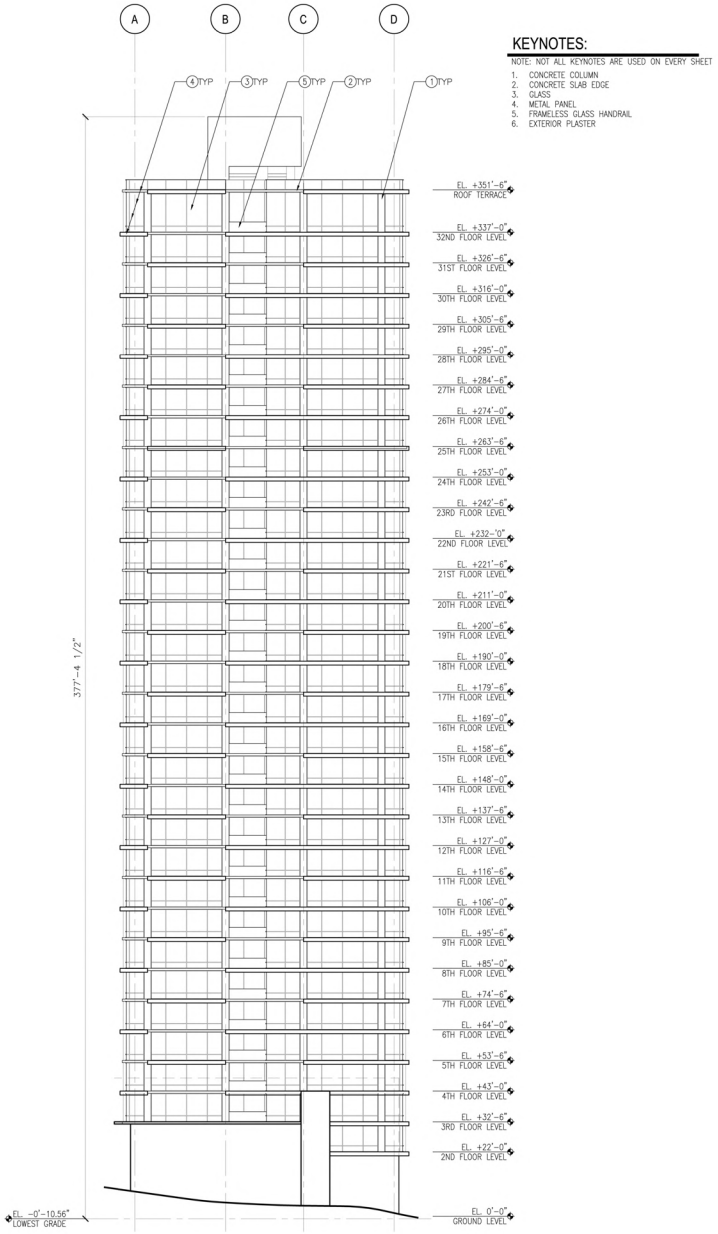
Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-17
Exterior Elevations East & South




2 EXTERIOR ELEVATION - NORTH




**KEYNOTES:**

NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

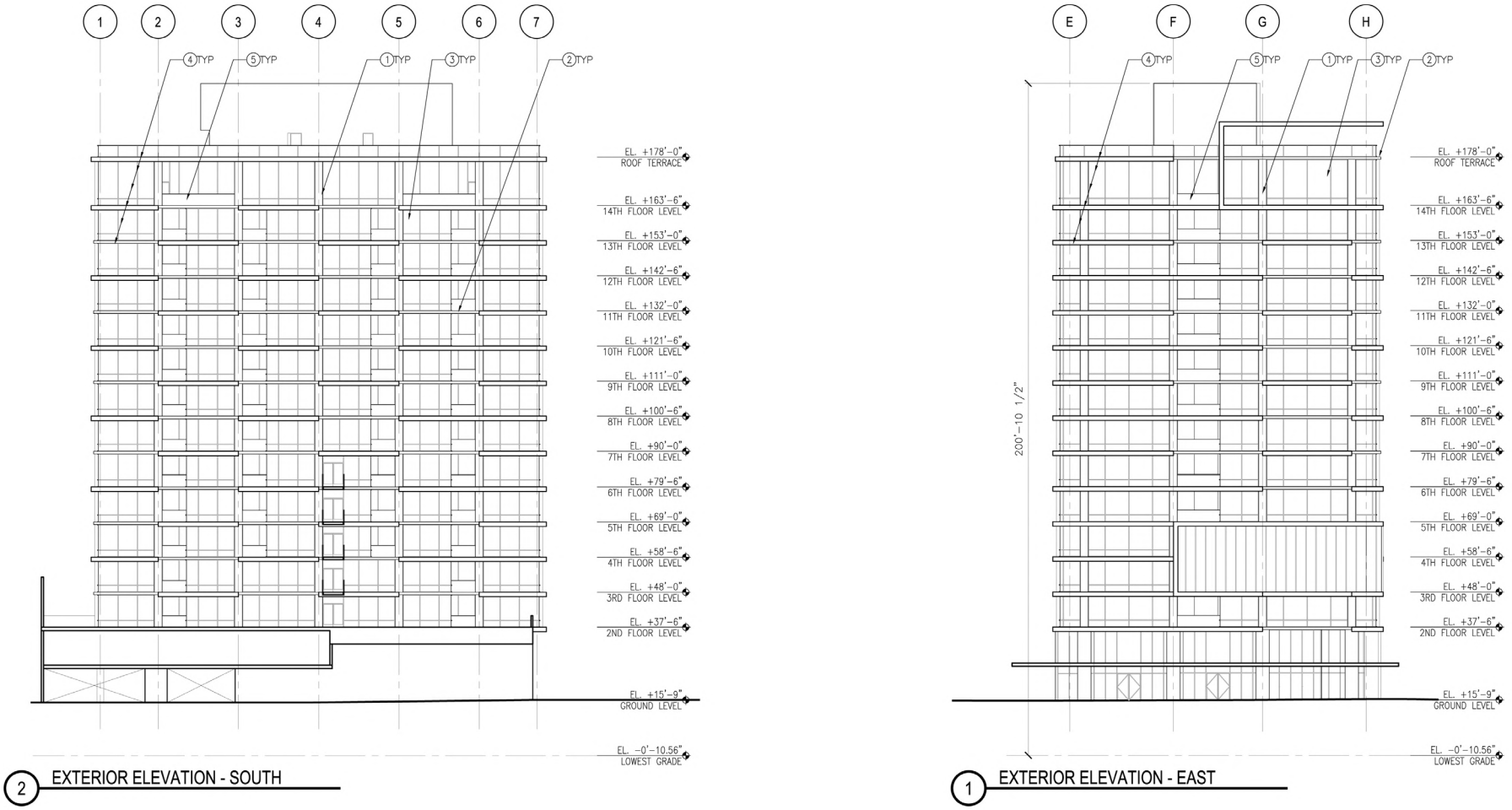
1. CONCRETE COLUMN
2. CONCRETE SLAB EDGE
3. GLASS
4. METAL PANEL
5. FRAMELESS GLASS HANDRAIL
6. EXTERIOR PLASTER

1 EXTERIOR ELEVATION - WEST

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-18
Exterior Elevations West & North




Source: Gruen Associates, 2016.

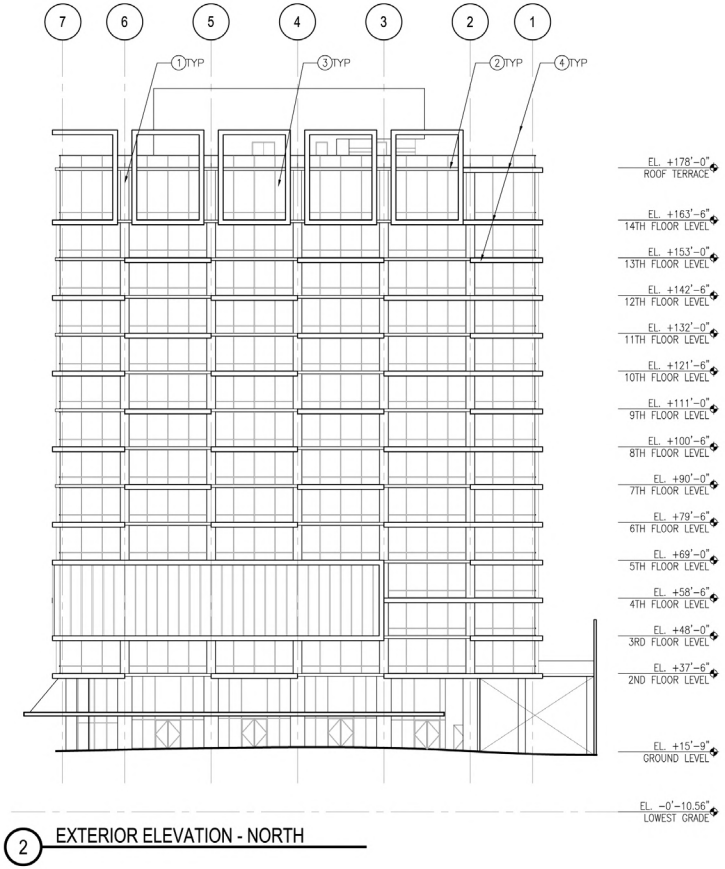
CAJA Environmental Services, LLC

Figure II-19
Exterior Elevations East & South

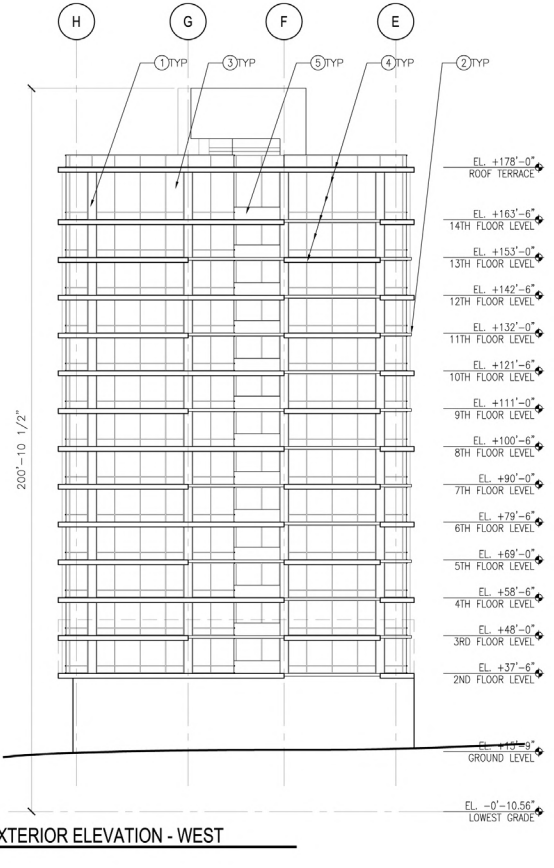
KEYNOTES:

NOTE: NOT ALL KEYNOTES ARE USED ON EVERY SHEET

1. CONCRETE COLUMN
2. CONCRETE SLAB EDGE
3. GLASS
4. METAL PANEL
5. FRAMELESS GLASS HANDRAIL
6. EXTERIOR PLASTER

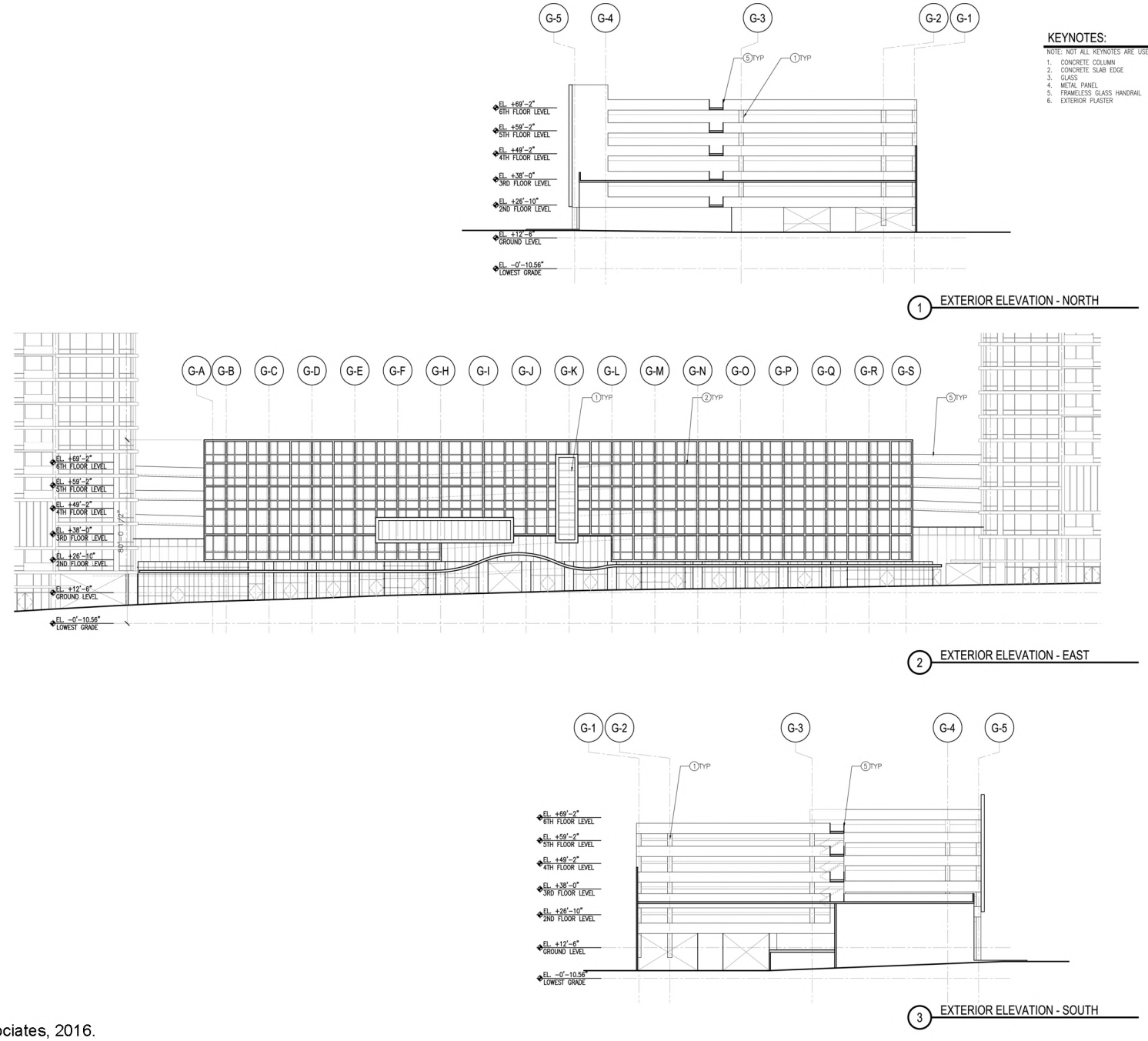



2 EXTERIOR ELEVATION - NORTH




1 EXTERIOR ELEVATION - WEST

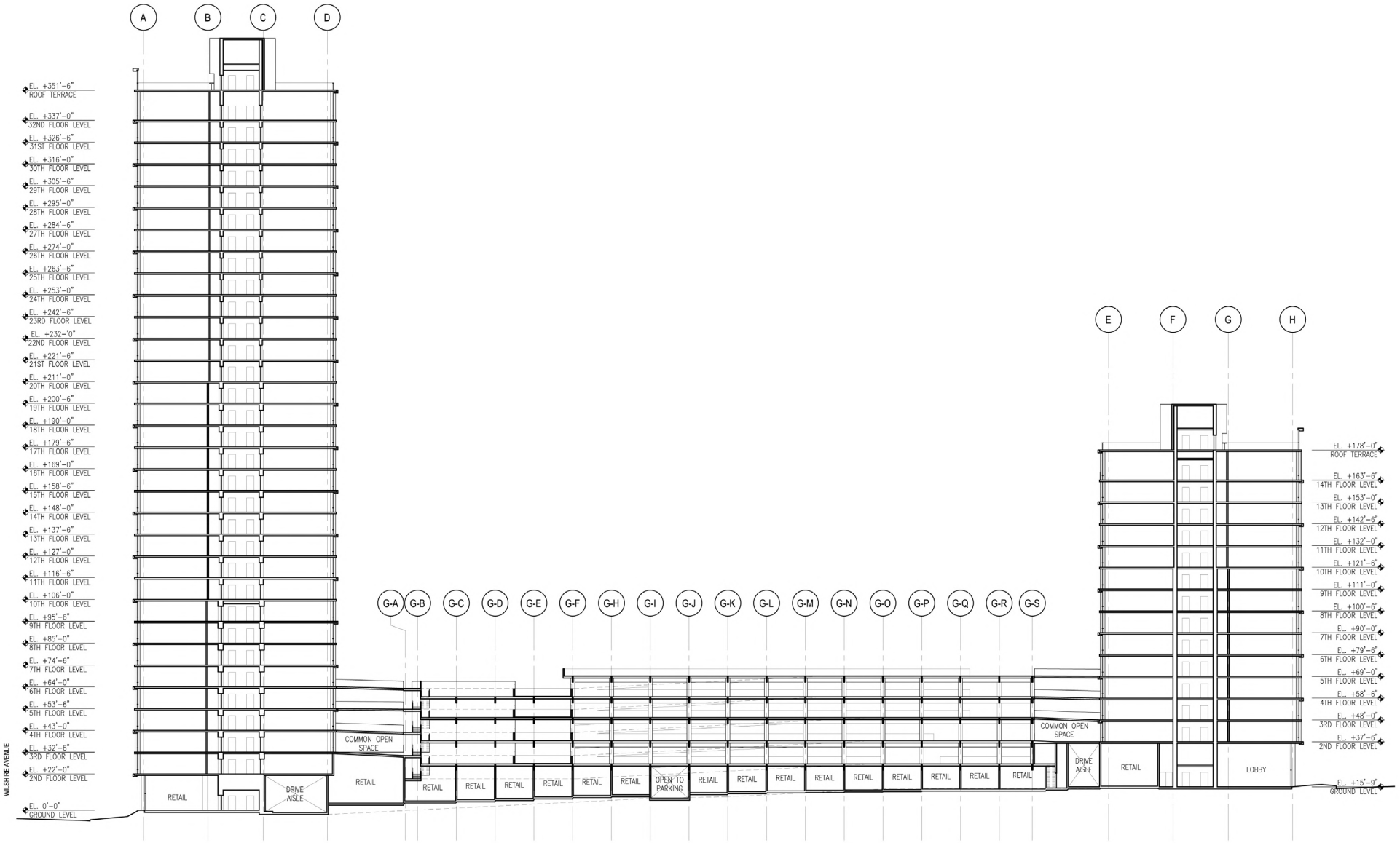
Source: Gruen Associates, 2016.



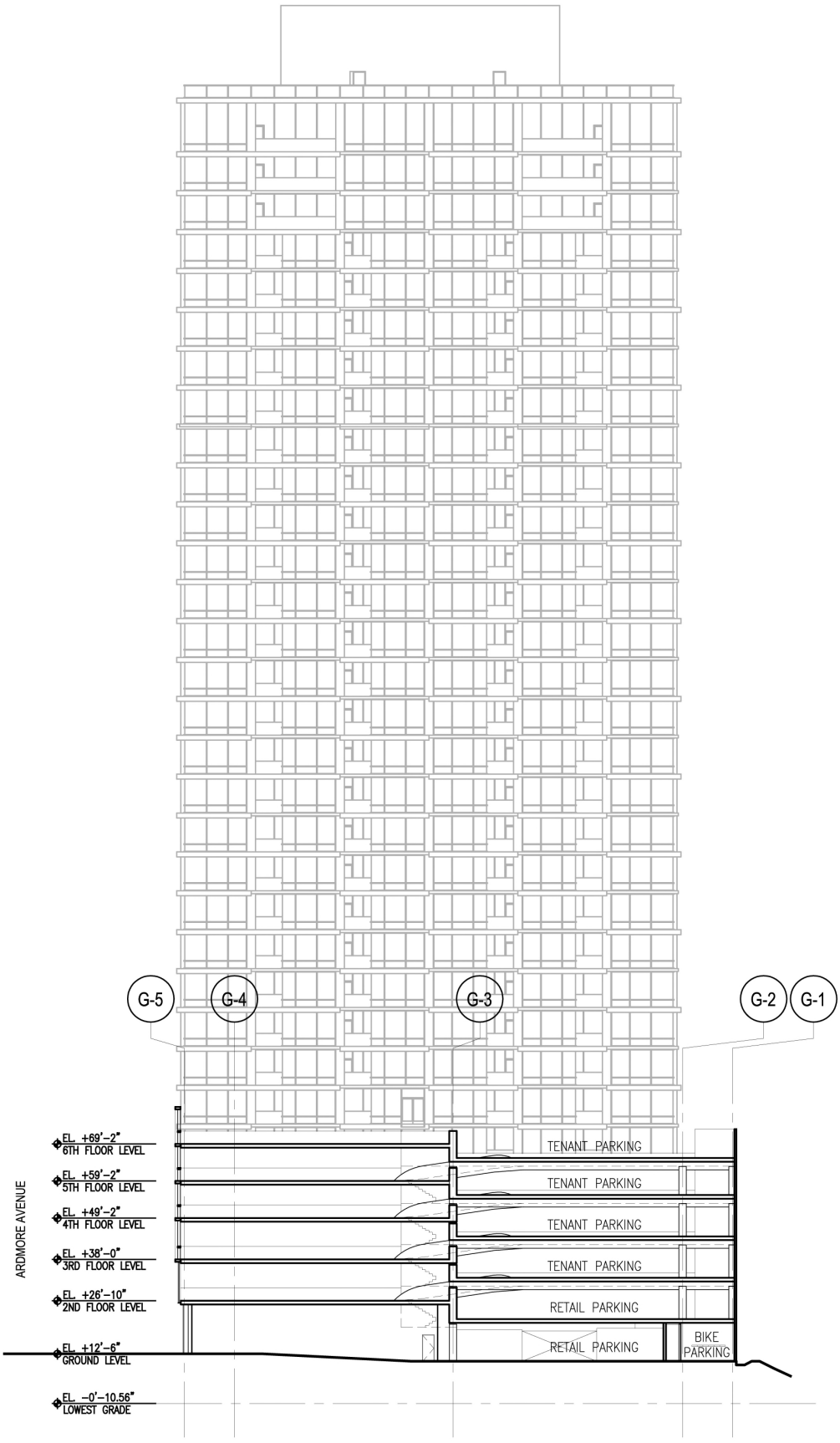

Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-21
Exterior Garage Elevations North, East, & South




Source: Gruen Associates, 2016.




Source: Gruen Associates, 2016.

CAJA Environmental Services, LLC

Figure II-23
Building Sections

bedroom units, 260 two-bedroom units, and 36 three-bedroom units. Approximately 31,689 square feet of ground-floor retail land uses would extend across the Project site including the ground-floor level of the two residential buildings. The area between the two residential buildings would be developed with a six-level parking structure, including one on-grade level and 5 levels above the ground-floor retail, reaching approximately 81 feet in height as measured from the lowest point on the Project site.

The amount of open space provided as part of the Project would meet the Los Angeles Municipal Code (the "LAMC") requirements for open space (refer to Table II-1). The types of open space amenities that would be provided as part of the Project include balconies, courtyards, green space between buildings, community rooms, gym, pool, Jacuzzi, seating areas, cabanas, art installations, barbeques, and fire pits.

**Table II-1**
**Open Space Required of and Provided by the Project**

| LAMC Open Space Requirement | Project Units | Total Open Space Required |
|---|---|---|
| <3 habitable rooms = 100 sf/du | 132 du | 13,200 sf |
| =3 habitable rooms = 125sf/du | 260 du | 32,500 sf |
| >3 habitable rooms = 175 sf/du | 36 du | 6,300 sf |
| | *Total Required* | *52,000 sf* |
| | **Total Provided** | **52,000 sf** |
| *sf = square feet* *du = dwelling unit* | | |

The Project would include 864 vehicle parking spaces – 819 residential-related spaces and 45 retail spaces (refer to Table II-2). The Project also would include 652 bicycle parking spaces – 522 long-term residential spaces, 38 long-term retail spaces, 54 short-term residential spaces, and 38 short-term retail spaces (refer to Table II-3), exceeding LAMC bicycle space parking requirements.

**Table II-2**
**Project Vehicle Parking**

| Land Uses | LAMC Parking Requirement | Project Parking (spaces) |
|---|---|---|
| Residential | | |
| 428 dwelling units | 2.0/unit | 856 |
| Guest Parking | 0.25 space/unit | 107 |
| | *Residential Parking Subtotal* | *963* |
| | *Less 15% Transit-Proximity Reduction* | *(144)* |
| | ***Total Residential Parking*** | ***819*** |
| Retail | | |
| 31,689 sf | 2.0 space/1,000 sf | 63 |
| | *Less 30% Transit-Proximity Reduction* | *(18)* |
| | ***Total Retail Parking*** | ***45*** |
| | **Total Vehicle Parking Required** | **864** |
| | **Total Vehicle Parking Provided** | **864** |
| *LAMC = Los Angeles Municipal Code* *sf = square feet* | | |

**Table II-3**
**Project Bicycle Parking**

| Land Use | LAMC Bicycle Parking Requirement[1] | Bicycle Parking Spaces |
|---|---|---|
| Residential<br>428 units | Short-term = 1.0 space/unit<br>Long-term = 1.0 space/10 units | Required<br>Short-term = 428<br>Long-term = 43 |
| Retail<br>31,689 square feet | Short-term = 1.0 space/2,000 sf<br>Long-term = 1.0 space/2,000 sf | Required<br>Short-term = 16<br>Long-term = 16 |
| | **Total Bicycle Parking Provided** | **Residential**<br>**Short-term = 522**<br>**Long-term = 54**<br>**Retail**<br>**Short-term = 38**<br>**Long-term = 38** |
| *LAMC = Los Angeles Municipal Code* *sf = square feet* | | |

Vehicular access to the Project would be provided via a driveway on 6th Street, allowing right-turn in and right-out access to the parking structure. Two additional driveways on Ardmore Avenue also would provide access to the Project site. The southern of these two driveways would provide inbound access to the retail-related parking spaces on the ground-floor level of the parking structure and two-way access to the upper residential parking levels, while the northern driveway would operate as one-way outbound from the ground-floor parking level. A valet car-drop-off area would be included on the ground-floor parking level.

# REQUESTED DISCRETIONARY ACTIONS

In order to implement the Project, the Project Applicant is requesting the following approvals from the City:

- Vesting Zone Change from C2-2, C4-2, P-2, and R5-2 to C4-2, pursuant to LAMC Section 12.32.Q.

- Vesting Tentative Tract Map (Tract No. 73981) to merge the land into a single ground lot, with 7 airspace lots, to facilitate the creation of a mixed-use development consisting of approximately 428 residential condominiums, with approximately 31,689 square feet of commercial space, pursuant to LAMC Section 17.01.

    - The subdivision would create one ground lot and 7 airspace lots that would include the following uses:

        - Lot 1: ground lot

- Lot 2: dwelling units in south residential building (Wilshire Tower)
- Lot 3: dwelling units in north residential building (6th Street Tower)
- Lot 4: residential amenity
- Lot 5: retail space
- Lot 6: residential parking
- Lot 7: retail parking
- Lot 8: common facilities

- Zero-foot side yard for the parking structure west elevation, at levels 2-6, in lieu of the 16 feet otherwise required by the structure's inclusion of residential parking, pursuant to LAMC Section 12.28.

- Site Plan Review for the Project that would result in an increase of more than 50 dwelling units, pursuant to LAMC Section 16.05.

Other approvals and permits from the Department of Building and Safety and other municipal agencies would be required for Project construction actions including, but not limited to demolition, excavation, shoring, grading, foundation, building, and tenant improvements.

# CALIFORNIA ENVIRONMENTAL QUALITY ACT
# INITIAL STUDY
# AND CHECKLIST

| LEAD AGENCY: | COUNCIL DISTRICT: | DATE: |
|---|---|---|
| City of Los Angeles | 10 | |

**RESPONSIBLE AGENCIES:**
City of Los Angeles

| PROJECT TITLE: | CASE NO.: |
|---|---|
| 3545 Wilshire Boulevard | CPC-2016-341-VZC-ZAA-SPR<br>ENV-2016-343-MND |

**PROJECT DESCRIPTION:** The Project includes demolition and removal of the existing structures and parking areas at the Project site and development of the site with an approximately 513,732-square-foot mixed-use building, including 482,043 square feet of multi-family residential dwelling units (428 units), retail land uses (31,689 square feet), and parking (864 vehicle parking spaces, 652 bicycle parking spaces). The Project includes two high-rise residential buildings – a 32-story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. The area between the two residential buildings would be developed with a six-level parking structure, including one on-grade level and 5 levels above the ground-floor retail, reaching approximately 81 feet in height as measured from the lowest point on the Project site. In order to implement the Project, the Project Applicant is requesting the following approvals from the City: 1) Vesting Zone Change from C2-2, C4-2, P-2, and R5-2 to C4-2, pursuant to LAMC Section 12.32.Q; 2) Vesting Tentative Tract Map (Tract No. 73981) to merge the land into a single ground lot, with 7 airspace lots, to facilitate the creation of a mixed-use development consisting of approximately 428 residential condominiums, with approximately 31,689 square feet of commercial space, pursuant to LAMC Section 17.01; 3) Zero-foot side yard for the parking structure west elevation, at levels 2-6, in lieu of the 16 feet otherwise required by the structure's inclusion of residential parking, pursuant to LAMC Section 12.28; and 4) Site Plan Review for the Project that would result in an increase of more than 50 dwelling units, pursuant to LAMC Section 16.05.

**ENVIRONMENTAL SETTING:** The 1.99-acre Project site is located in the Wilshire Community Plan Area of the City of Los Angeles (the "City"). Regional access to the Project site is provided via U.S. Highway 101 (the "Hollywood Freeway"). The Project site is located at approximately 3545 Wilshire Boulevard and comprises assessor's parcel numbers (APNs) 550-302-5012, 550-302-5004, and 550-302-5014. The Project site is bound by Wilshire Boulevard to the south, Ardmore Avenue to the east, 6th Street to the north, and two restaurants, a surface parking lot, and a pre-/kindergarten school to the west. The Project site is currently developed with a 67,733-square-foot medical office, an 11,470-square-foot commercial/retail building, and surface parking areas.

**PROJECT LOCATION:** 3539, 3541, 3543, 3545, 3547, 3549, 3551 West Wilshire Boulevard and 601, 611, 619, 627, 637, 645 South Ardmore Avenue, Los Angeles, CA 90010

| PLANNING DISTRICT: | STATUS | |
|---|---|---|
| Wilshire | ☐ PRELIMINARY<br>☐ PROPOSED<br>■ ADOPTED | |
| **EXISTING ZONING:**<br>C4-2, C2-2, R5-2, P-2 | **MAX. DENSITY ZONING:**<br>Units permitted by C4 Zone = 1 unit/400 sf lot area<br>Units permitted by C4 Zone and mixed-use provision LAMC Section 12.22.A.18 = 1 unit/200 sf lot area | ■ DOES CONFORM TO PLAN<br>☐ DOES NOT CONFORM TO PLAN |
| **PLANNED LAND USE & ZONING:**<br>Regional Center Commercial, C4-2 | **MAX. DENSITY PLAN:** | ☐ NO DISTRICT PLAN |
| **SURROUNDING LAND USES:**<br>C4-2, CR-2, R5-2 | **PROJECT DENSITY:**<br>1 unit/200 sf | |

**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.

x 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 With 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.

| | |
|---|---|
| | CITY PLANNER |
| **SIGNATURE** | **TITLE** |

## EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

    C. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's

environmental effects in whichever format is selected.

9. The explanation of each issue should identify:

    A. The significance criteria or threshold, if any, used to evaluate each question; and

    B. The mitigation measure identified, if any, to reduce the impact to less than significance.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least an impact that is a "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages:

| | | |
|---|---|---|
| ☐ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Population & Housing |
| ☐ Agricultural Resources | ■ Hazards & Hazardous Materials | ■ Public Services |
| ■ Air Quality | ☐ Hydrology & Water Quality | ■ Recreation |
| ■ Biological Resource | ☐ Land Use & Planning | ■ Transportation/Traffic |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Utilities & Service Systems |
| ☐ Geology & Soils | ■ Noise | ☐ Mandatory Findings of Significance |

## INITIAL STUDY CHECKLIST (to be completed by the Lead Agency)

### BACKGROUND

| | |
|---|---|
| **PROPONENT NAME**<br>3545 Wilshire, LCC | **PHONE NUMBER**<br>Tel: 213-201-1009 |
| **PROPONENT ADDRESS**<br>3470 Wilshire Boulevard, Suite 700<br>Los Angeles, CA 90010 | **PROPONENT REPRESENTATIVE**<br>Garrett Lee |
| **AGENCY REQUIRING CHECKLIST**<br>City of Los Angeles | **DATE SUBMITTED** |
| **PROPOSAL NAME (if applicable)**<br>3545 Wilshire Boulevard Project | |

## ENVIRONMENTAL IMPACTS

Explanations of all potentially and less than significant impacts are discussed below.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **1. Aesthetics.** Would the project: | | | | |
| a. Have a substantial adverse effect on a scenic vista? | | | | ✓ |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, 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? | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **2. Agriculture and Forestry Resources.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: | | | | |
| 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 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 [g])? | | | | ✓ |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | | | | ✓ |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **3. Air Quality.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project: | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality 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 project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | | ✓ | | |
| d. Expose sensitive receptors to substantial pollutant concentrations? | | ✓ | | |
| e. Create objectionable odors affecting a substantial number of people? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **4. Biological Resources.** Would the project:: | | | | |
| 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? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **5. Cultural Resources.** Would the project: | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? | | | ✓ | |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | | | ✓ | |
| c. Directly or indirectly destroy a unique paleontological resource or site or | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **5. Cultural Resources.** Would the project: | | | | |
| unique geologic feature? | | | | |
| d. Disturb any human remains, including those interred outside of formal cemeteries? | | | ✓ | |
| e. Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource? | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **6. Geology & Soils.** Would the project: | | | | |
| a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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. | | | | ✓ |
| b. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? | | | ✓ | |
| c. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction? | | | | ✓ |
| d. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? | | | | ✓ |
| e. Result in substantial soil erosion or the loss of topsoil? | | | ✓ | |
| f. 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? | | | ✓ | |
| g. 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? | | | ✓ | |
| h. 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? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **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? | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **8. Hazards & 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? | | | ✓ | |
| 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 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? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **9. Hydrology & Water Quality**. Would the project: | | | | |
| a. Violate any water quality standards or waste discharge requirements? | | | | ✓ |
| b. 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)? | | | | ✓ |
| 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 off-site? | | | ✓ | |
| 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 off-site? | | | ✓ | |
| 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 hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **9. Hydrology & Water Quality**. Would the project: | | | | |
| hazard delineation map? | | | | ✓ |
| h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | | | | ✓ |
| i. 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? | | | | ✓ |
| j. Inundation by seiche, tsunami or mudflow? | | | | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **10. Land Use and Planning**. Would the project: | | | | |
| a. Physically divide an established community? | | | | ✓ |
| b. Conflict with any 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? | | | ✓ | |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **11. Mineral Resources**. Would the project: | | | | |
| a. Result in the loss or availability of a known mineral resource that would be of value to the region and the residents or 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? | | | | ✓ |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **12. Noise**. Would the project result in: | | | | |
| a. 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? | | ✓ | | |
| b. Exposure of persons 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? | | | ✓ | |
| 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 | | | | ✓ |

**12. Noise**. Would the project result in:

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | | ✓ |

**13. Population and Housing**. Would the project:

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | | ✓ |

**14. Public Services**.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| 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? | | | ✓ | |

**15. Recreation**.

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | | | ✓ | |
| b. Does the project include recreational facilities or require the construction or expansion on recreational facilities which might have an adverse physical effect on the environment? | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **16. Transportation/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 transit? | | | ✓ | |
| 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 count congestion management agency for designated roads or highways? | | | ✓ | |
| c. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? | | | | ✓ |
| d. 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? | | | ✓ | |
| e. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | | | ✓ | |
| f. Result in inadequate emergency access? | | | ✓ | |
| g. Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)? | | | ✓ | |

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **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 a new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | | | ✓ | |
| c. 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? | | | ✓ | |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resources, 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? | | | ✓ | |

**18. Mandatory Findings of Significance.**

| | Potentially Significant Impact | Less Than Significant With Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to degrade the quality of he 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? | | | ✓ | |
| b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects? | | | ✓ | |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | | ✓ | |

# IV. ENVIRONMENTAL IMPACT ANALYSIS

## 1. AESTHETICS

In 2013, the State of California enacted Senate Bill 743 (SB 743). Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the L.A. CEQA Thresholds Guide.

The 3545 Wilshire Boulevard Project is a mixed-use infill development, including 428 dwelling units and 36,000 square feet of ground-floor retail. Because the Project site is located approximately 300 feet from the Metro Wilshire/Normandie transit station, the Project site is located in a transit priority area as defined in Public Resources Code Section 21099. Further, the Project site is located in an urban area on a lot currently developed with commercial and surface parking uses. Thus, the Project's aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

On February 10, 2016, the City circulated Zoning Information File No. 2452 to clarify the locations of transit priority areas within the City, and reaffirm that aesthetic impacts shall not be considered a significant impact on the environment when the provisions of SB 743 apply (refer to Appendix A). Specifically, Zoning Information File No. 2452 states that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact, as defined in the City's CEQA Threshold Guide, shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA. A map of transit priority areas is attached to Zoning Information File No. 2452 in Appendix A. As shown on that map, the Project site is within a transit priority area. Therefore, an assessment of the Project's potential aesthetics impacts is not required. The information below regarding aesthetics is provided for informational purposes only.

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

**No Impact**. The Project site is located in a highly urbanized area of the City of Los Angeles (the "City"). Views from within the Project area are largely limited to typical urban development (e.g., buildings/structures, signage, lighting, roadway infrastructure, etc.). No scenic views are available from within the Project area. The Project would not have a substantial adverse effect on a scenic vista. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA.

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

**No Impact.** The Project site is located in a highly urbanized are of the City. The Project site is not located on a scenic highway.[1] With the exception of trees, no scenic resources are located on the Project site. Thirteen street trees are located adjacent to the Project site, six of which would be removed as part of the Project. However, as required by the City and as outlined in Mitigation Measure 4-1 (refer to 4. Biological Resources), the street trees would be replaced on the Project site at a 1:1 ratio. The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA.

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

**No Impact.** The Project site is located in a highly urbanized are of the City. The Project site is currently developed with a 67,733-square-foot medical office, an 11,470-square-foot commercial/retail building, and surface parking areas. Existing land uses surrounding the Project site include commercial to the south; commercial and multi-family residential to the east; commercial to the north; and commercial, institutional, and parking to the west. The visual character of the Project site and surrounding area is that of a highly urbanized city fully developed with a mix of low- to high-rise buildings along the Wilshire Boulevard corridor and other high capacity roadways interspersed with low- to mid-rise residential neighborhoods, signage, lighting, and utility and roadway infrastructure. The Project includes removal of the existing land uses from the Project site and development of the site with approximately 482,043 square feet of multi-family residential dwelling units, retail land uses, and parking. The Project includes two high-rise residential buildings – a 32-story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. Although the Project would change the visual character of the Project site and surrounding area, this change would not constitute a substantial

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[1] *California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm*

degradation. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA.

***Shade/Shadow***

A shade/shadow analysis was prepared for the Project by CAJA Environmental Services, date January 5, 2016 (refer to Appendix B). The City defines shade-sensitive land uses as follows:

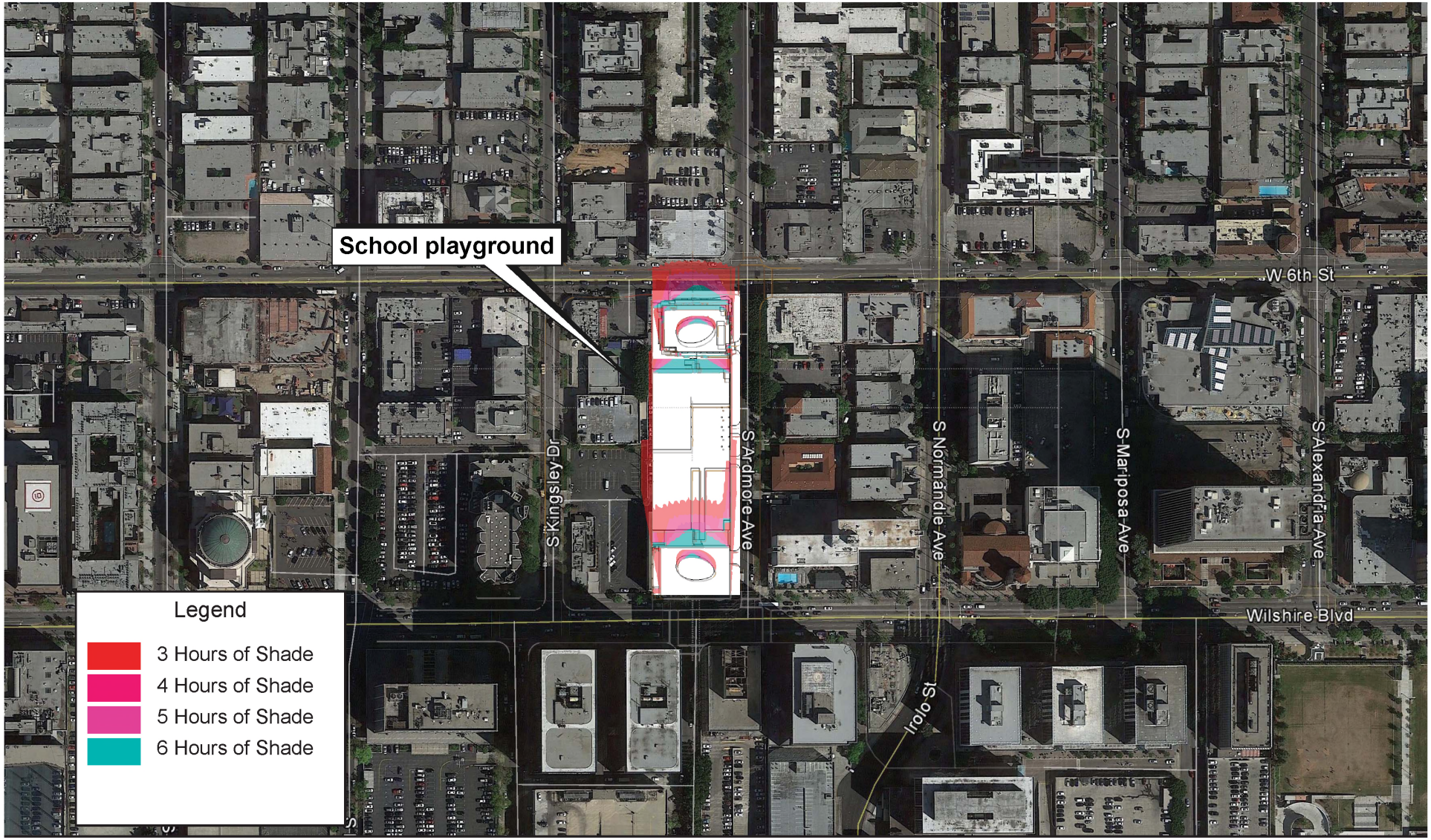
> *Facilities and operations sensitive to the effects of shading include: routine useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and solar collectors. These uses are considered sensitive because sunlight is important to physical comfort or commerce.*

Based on a review of the land uses surrounding the Project site, the closest shade-sensitive land use in proximity to the site is the playground associated with the pre-school/kindergarten located to the west of the Project site, as shown on Figures IV-1 through IV-4, which depict the shadows that would be cast by Project buildings at the Summer and Winter Solstices and the Fall and Spring Equinoxes. The eastern boundary of the playground is landscaped with tall trees/shrubs, which shade much of the playground area from sunrise to before 12 pm.

The City's significance threshold for shade/shadow impacts is as follows:

> *A project impact would normally be considered significant if shade-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 am and 3 pm PST (between October and early April), or for more than four hours between the hours of 9 am and 5 pm PDT (between early April and late October).*

The longest shadows (worst-case shadows) occur around the Winter Solstice (refer to Figure IV-4). By 12 pm, shadows during this time of year cast nearly due north from their source. As indicated on Figures IV-1 through IV-4, the Project site and the pre-school/kindergarten are oriented north/south-east/west and are parallel to each other, with the pre-school/kindergarten playground located directly west of the Project site boundary. Similar to what occurs under the existing condition associated with the landscaping along the eastern boundary of the playground, the Project would cast shadow onto the playground at 9 am, rotating away from the playground to cast nearly due north by 12 pm. From some time before 12 pm and throughout the rest of the daytime hours during anytime throughout the year, the Project would not cast shadow on the playground. Because there are only 3 hours between 9 am and 12 pm, the Project would not have the potential to ever exceed the City's significance threshold and would not cause a significant shade/shadow impact on the pre-school/kindergarten. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA.

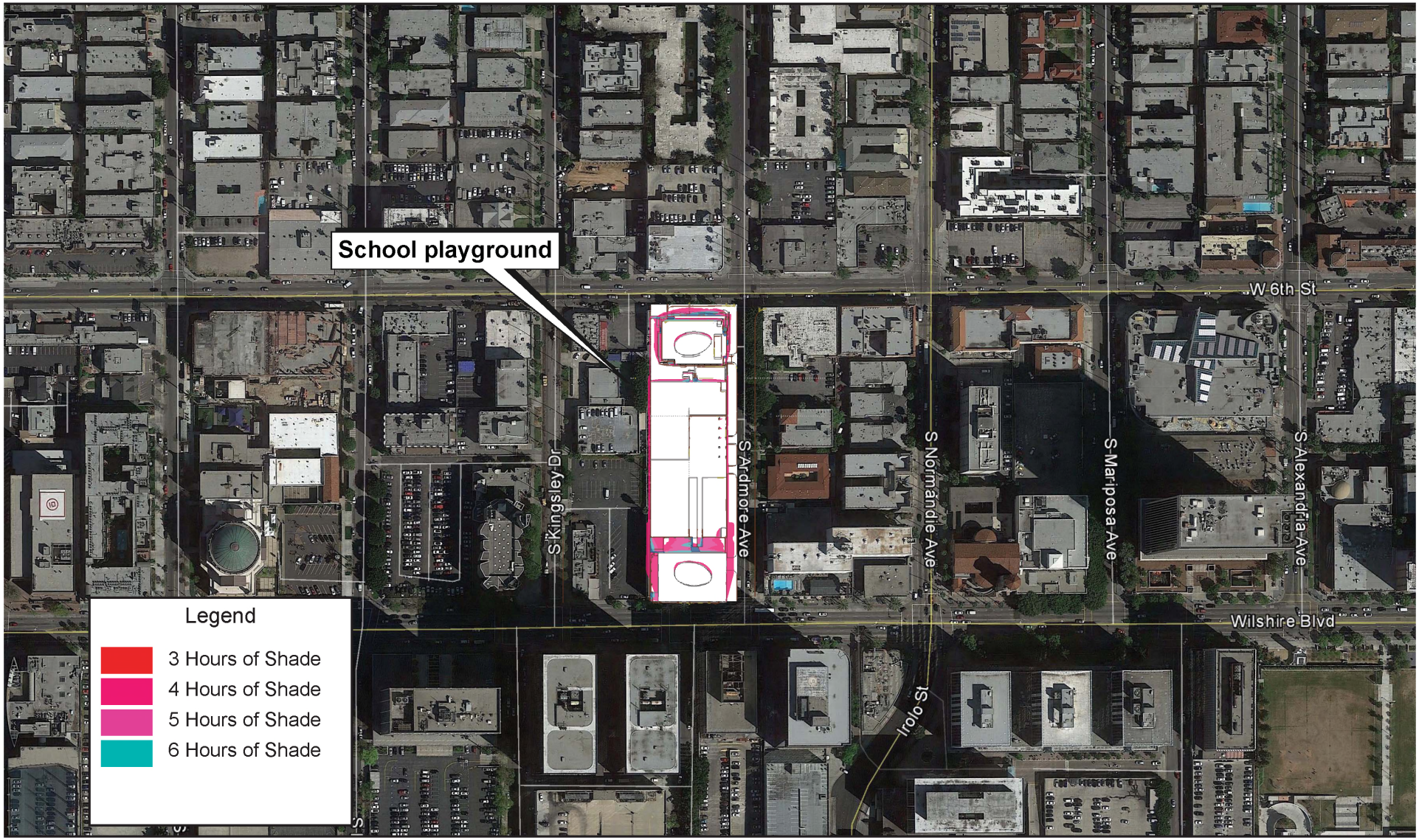



Spring Shadows
9:00 AM - 3:00 PM
Pacific Standard Time

Source: Scott Johnson, 2016.

CAJA Environmental Services, LLC

Figure IV-1
Spring Shadows

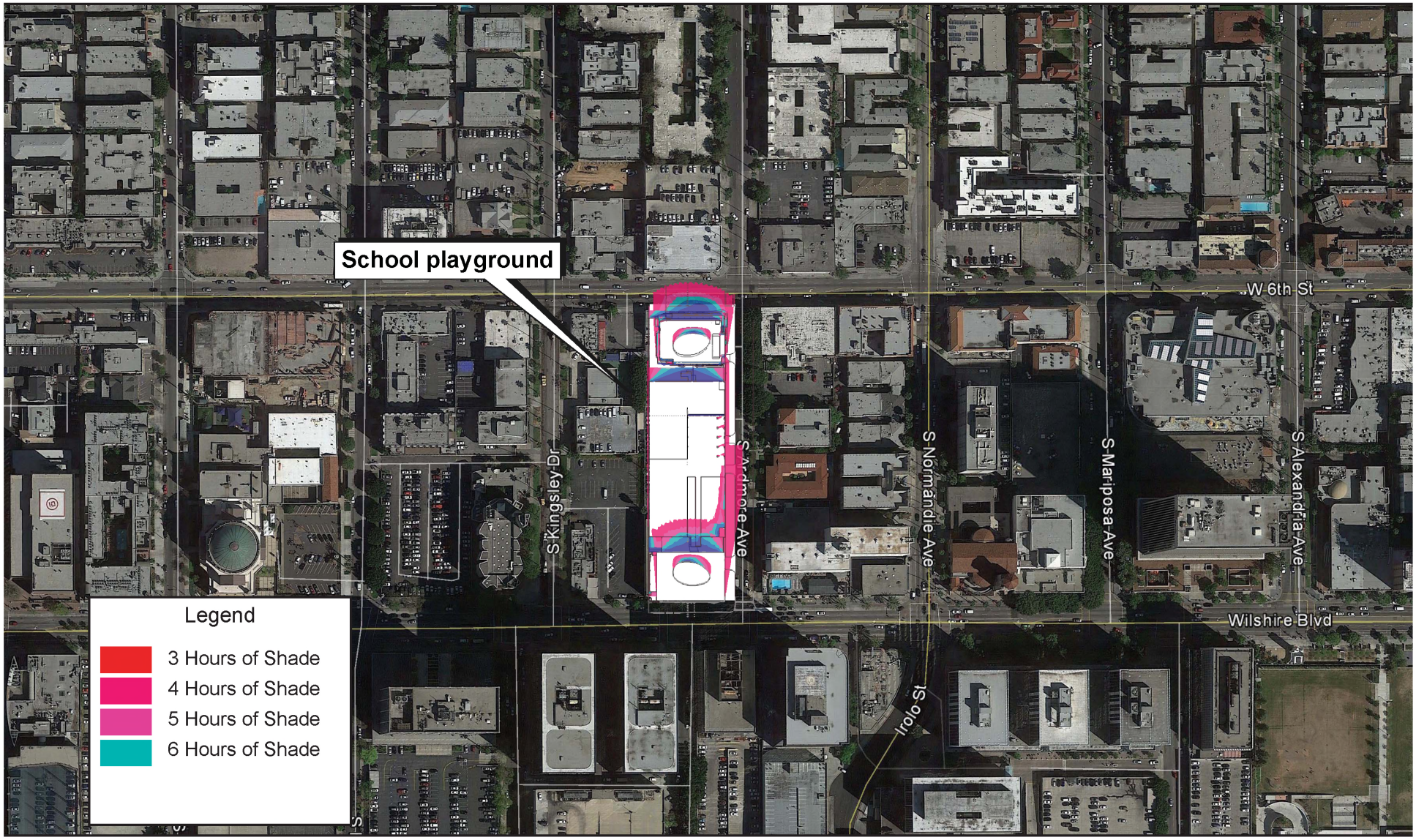



Summer Shadows
9:00 AM - 5:00 PM
Pacific Daylight Time

Source: Scott Johnson, 2016.

CAJA Environmental Services, LLC

Figure IV- 2
Summer Shadows

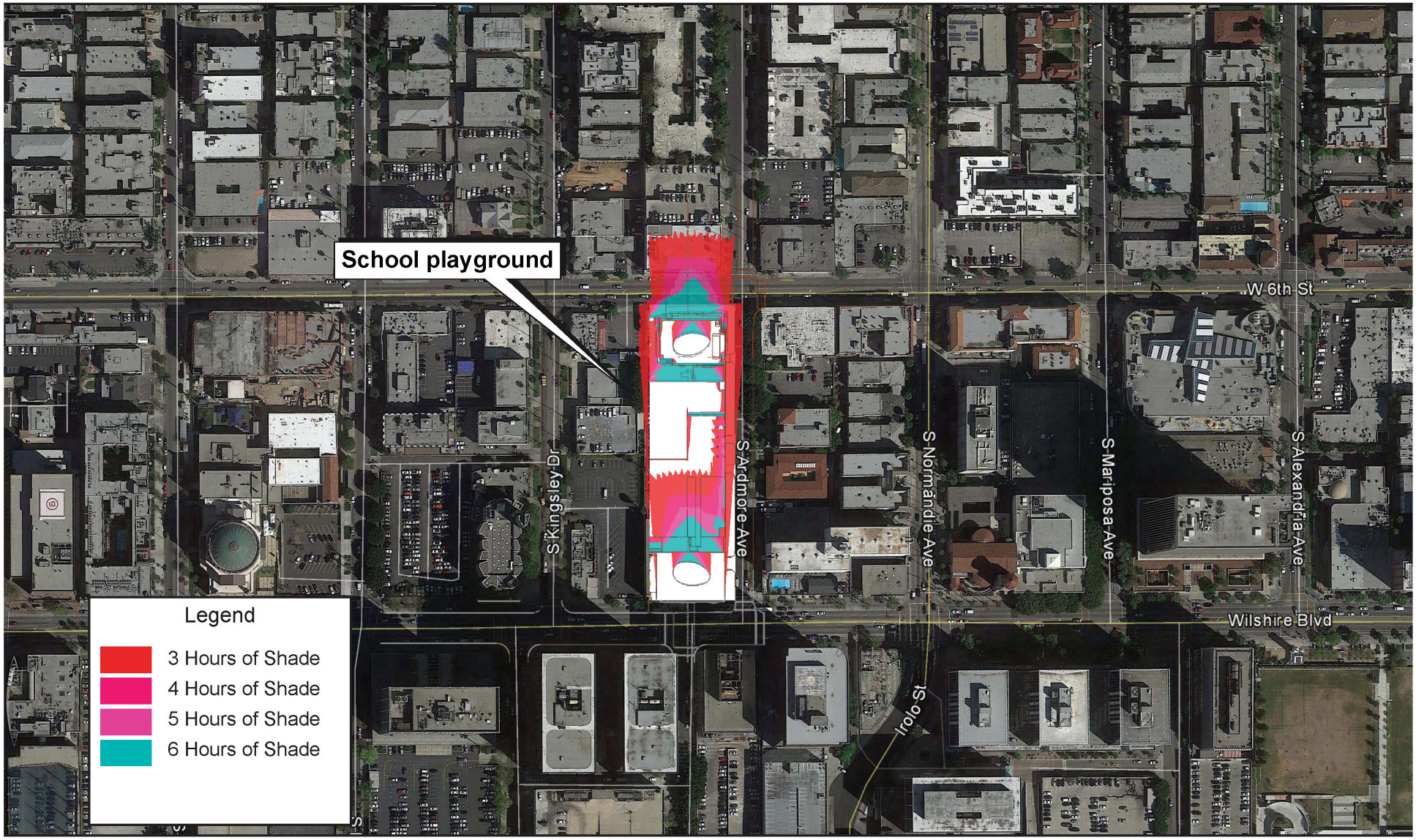



Fall Shadows
9:00 AM - 5:00 PM
Pacific Daylight Time

Source: Scott Johnson, 2016.

CAJA Environmental Services, LLC

Figure IV-3
Fall Shadows




Winter Shadows
9:00 AM - 3:00 PM
Pacific Standard Time

Source: Scott Johnson, 2016.

CAJA Environmental Services, LLC

Figure IV-4
Winter Shadows

**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.** The Project site is located in a highly urbanized area of the City. The Project site is currently developed with a 67,733-square-foot medical office, an 11,470-square-foot commercial/retail building, and surface parking areas. Existing land uses surrounding the Project site include commercial to the south; commercial and multi-family residential to the east; commercial to the north; and commercial, institutional, and parking to the west. All of these land uses produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, etc.) typical of such uses in an urban area. The Project would include interior and exterior lighting that complies with the LAMC provision that requires minimizing the effect of the new sources of lighting. Specifically, LAMC Section 91.6205 requires that new lighting sources not exceed 1 foot-candle of new light spillover at residential property lines. Consequently, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would be required to use non-reflective glass, pursuant to LAMC Section 93.0117. The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In addition, SB 743 states that aesthetics shall not be considered a significant impact under CEQA.

## 2. AGRICULTURE AND FORESTRY RESOURCES

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

**No Impact.** The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project site is not included in the Important Farmland category.[2] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

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

**No Impact.** The Project site is not zoned for agricultural use, and the site is not under Williamson Act Contract.[3] Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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[2] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998.*

[3] *Ibid.*

**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 not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site does not contain any forest land. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project site or within the area. Therefore, no impacts related to this issue would occur.

# 3. AIR QUALITY

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

**Less Than Significant Impact**. The Project would not conflict with the South Coast Air Quality Management District's (SCAQMD) 2012 Air Quality Management Plan (the "AQMP"), nor jeopardize the region's attainment of air quality standards. The regional ozone attainment plan centers on accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012-2035 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (the "2012-2035 RTP/SCS") are largely built off local growth forecasts from local governments like the City. The 2012-2035 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City by 2020.

As discussed in more detail in response to Checklist Question 13a, as shown on Table IV-30, the Project would represent a negligible percent of the estimated population and housing growth in the City. The Project's residents and housing units would be within the forecasted population and housing estimates. Additionally, the Project would help achieve a portion of the household growth forecast for the City, while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled (VMT). Thus, the Project would not represent a substantial or significant growth as compared to

projected growth. The Project includes development of a mix of multi-family residential and retail, as is called for in the City's General Plan. As such, the Project is consistent with the growth assumptions in the regional air plan. Therefore, Project impacts related to inconsistency with the AQMP would be less than significant.

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

**Less Than Significant With Mitigation Incorporated.** Both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

**Pollutants and Effects**

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone ($O_3$), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter ($PM_{10}$), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[4] The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's

[4] *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone ($O_3$) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides ($NO_X$) react in the presence of ultraviolet sunlight. $O_3$ is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and $NO_X$, the components of $O_3$, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in $O_3$ formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to $O_3$ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Dioxide ($NO_2$) like $O_3$, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and $NO_2$ are collectively referred to as $NO_X$ and are major contributors to $O_3$ formation. $NO_2$ also contributes to the formation of $PM_{10}$. High concentrations of $NO_2$ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between $NO_2$ and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

- Sulfur Dioxide ($SO_2$) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of $SO_2$ are coal and oil used in power plants and industries. Generally, the highest levels of $SO_2$ are found near large industrial complexes. In recent years, $SO_2$ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of $SO_2$ and limits on the sulfur content of fuels. $SO_2$ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. $SO_2$ can also yellow plant leaves and erode iron and steel.

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as $SO_2$, $NO_X$, and VOC. Inhalable particulate matter, or $PM_{10}$, is about 1/7 the thickness of a human hair. Major sources of $PM_{10}$ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and $PM_{10}$ pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and $PM_{10}$ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas $PM_{10}$ tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

  Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

**Regulatory Setting**

***Federal***

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than

California, where automobiles must meet stricter emission standards set by the California Air Resources Board (CARB).

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, $NO_2$, $O_3$, $PM_{2.5}$, $PM_{10}$, $SO_2$, and Pb. The CAA requires USEPA to designate areas as attainment, non-attainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized on Table IV-1. The USEPA has classified the South Coast Air Basin (the "Basin") as non-attainment for $O_3$, $PM_{2.5}$, and $PM_{10}$ and maintenance for CO and $NO_2$.

***State***

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

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

**Table IV-1**
**State and National Ambient Air Quality Standards and**
**Attainment Status for the South Coast Air Basin**

| Pollutant | Averaging Period | California | | Federal | |
|---|---|---|---|---|---|
| | | Standards | Attainment Status | Standards | Attainment Status |
| Ozone ($O_3$) | 1-hour | 0.09 ppm (180 µg/m$^3$) | Non-attainment | -- | -- |
| | 8-hour | 0.070 ppm (137 µg/m$^3$) | N/A[1] | 0.075 ppm (147 µg/m$^3$) | Non-attainment |
| | | | | | |
| Respirable Particulate Matter ($PM_{10}$) | 24-hour | 50 µg/m$^3$ | Non-attainment | 150 µg/m$^3$ | Non-attainment |
| | Annual Arithmetic Mean | 20 µg/m$^3$ | Non-attainment | -- | -- |
| | | | | | |
| Fine Particulate Matter ($PM_{2.5}$) | 24-hour | -- | -- | 35 µg/m$^3$ | Non-attainment |
| | Annual Arithmetic Mean | 12 µg/m$^3$ | Non-attainment | 15 µg/m$^3$ | Non-attainment |
| | | | | | |

**Table IV-1**
**State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin**

| Pollutant | Averaging Period | California | | Federal | |
|---|---|---|---|---|---|
| | | Standards | Attainment Status | Standards | Attainment Status |
| Carbon Monoxide (CO) | 8-hour | 9.0 ppm (10 mg/m$^3$) | Attainment | 9 ppm (10 mg/m$^3$) | Maintenance |
| | 1-hour | 20 ppm (23 mg/m$^3$) | Attainment | 35 ppm (40 mg/m$^3$) | Maintenance |
| | | | | | |
| Nitrogen Dioxide ($NO_2$) | Annual Arithmetic Mean | 0.030 ppm (57 µg/m$^3$) | Non-attainment | 53 ppb (100 µg/m$^3$) | Maintenance |
| | 1-hour | 0.18 ppm (338 µg/m$^3$) | Non-attainment | 100 ppb (188 µg/m$^3$) | Maintenance |
| | | | | | |
| Sulfur Dioxide ($SO_2$) | 24-hour | 0.04 ppm (105 µg/m$^3$) | Attainment | -- | Attainment |
| | 1-hour | 0.25 ppm (655 µg/m$^3$) | Attainment | 75 ppb (196 µg/m$^3$) | Attainment |
| | | | | | |
| Lead (Pb) | 30-day average | 1.5 µg/m$^3$ | Non-attainment | -- | -- |
| | Calendar Quarter | -- | -- | 0.15 µg/m$^3$ | Attainment |

[1]*N/A = CARB has not determined 8-hour $O_3$ attainment status*
*Source: CARB, Ambient Air Quality Standards, and attainment status, accessed October 20, 2014, (www.arb.ca.gov/desig/adm/adm.htm).*

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a non-attainment area for $O_3$, $PM_{2.5}$, and $PM_{10}$.[5]

***Local***

*South Coast Air Quality Management District*

The 1977 Lewis Air Quality Management Act merged four air pollution control district to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for

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[5] *CARB, Area Designation Maps, available at http://www.arb.ca.gov/desig/adm/adm.htm, accessed August 17, 2013.*

monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as non-attainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard by 2014.

In addition to criteria pollutants, the SCAQMD also regulates air toxics. A cornerstone of its work was the development of the Multiple Air Toxics Exposure Study (MATES-III). The monitoring program measured more than 30 air pollutants, including both gases and particulates, and estimated the risk of cancer from breathing toxic air pollution throughout the region. MATES-III found that the cancer risk in the region from carcinogenic air pollutants ranges from about 870 in a million to 1,400 in a million, with an average regional risk of about 1,200 in a million. An addendum to the plan was completed in March 2004 that included an update on the implementation of the mobile and stationary source strategies.

In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

*City of Los Angeles*

The Project is located in the Central City Community Plan Area. Air quality policies are governed by the City's General Plan, which includes an Air Quality Element. Adopted on November 24, 1992, the Element includes six key goals that relate directly or indirectly to air quality:

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

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

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

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

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

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

**Air Pollution Climatology**

The Project site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and $NO_2$ react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and $NO_2$ emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. $NO_2$ concentrations are also generally higher during fall and winter days.

### *Air Monitoring Data*

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project site area. Table IV-2 shows pollutant levels, state and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. The one-hour state standard for $O_3$ was exceeded three times during this three-year period, the daily state standard for $PM_{10}$ was exceeded eight times while the daily state standard for $PM_{2.5}$ was exceeded five times. CO and $NO_2$ levels did not exceed the CAAQS from 2012 to 2014.

### Existing Emissions

The Project site is currently developed with a 67,733-square-foot medical office building with 11,470 square feet of commercial and retail spaces, and a surface parking lot. As shown on Table IV-3, the majority of emissions associated with the existing land uses are generated from mobile sources that access the commercial and office uses at the Project site.

### Sensitive Receptors

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

**Table IV-2**
**2012-2014 Ambient Air Quality Data in the Project Site Vicinity**

| Pollutant | Pollutant Concentration & Standards | Central Los Angeles | | |
|---|---|---|---|---|
| | | 2012 | 2013 | 2014 |
| Ozone | Maximum 1-hour Concentration (ppm) | 0.093 | 0.081 | 0.113 |
| | Days > 0.09 ppm (State 1-hour standard) | 0 | 0 | 3 |
| | Days > 0.075 ppm (Federal 8-hour standard) | 1 | 0 | 2 |
| Carbon Monoxide | Maximum 1-hour Concentration (ppm) | N/A | N/A | N/A |
| | Days > 20 ppm (State 1-hour standard) | N/A | N/A | N/A |
| | Maximum 8-hour Concentration (ppm) | 1.9 | 2.0 | 2.0 |
| | Days > 9.0 ppm (State 8-hour standard) | 0 | 0 | 0 |
| Nitrogen Dioxide | Maximum 1-hour Concentration (ppm) | 0.0773 | 0.0903 | 0.0821 |
| | Days > 0.18 ppm (State 1-hour standard) | 0 | 0 | 0 |
| $PM_{10}$ | Maximum 24-hour Concentration ($\mu g/m^3$) | 80 | 57 | 66 |
| | Days > 50 $\mu g/m^3$ (State 24-hour standard) | 4 | 1 | 3 |
| $PM_{2.5}$ | Maximum 24-hour Concentration ($\mu g/m^3$) | 58.7 | 43.1 | N/A |
| | Days > 35 $\mu g/m^3$ (Federal 24-hour standard) | 4 | 1 | N/A |

| | | | | |
|---|---|---|---|---|
| Sulfur Dioxide | Maximum 24-hour Concentration (ppm) | N/A | N/A | N/A |
| | Days > 0.04 ppm (State 24-hour standard) | N/A | N/A | N/A |

*Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed October 25, 2015.*
*N/A: Not available at this monitoring station.*

**Table IV-3**
**Estimated Daily Operations Emissions**

| Emission Source | Pounds per Day | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area Sources | 2 | <1 | <1 | <1 | <1 | <1 |
| Energy Sources | <1 | 1 | <1 | <1 | <1 | <1 |
| Mobile Sources | 8 | 24 | 95 | <1 | 19 | 5 |
| **Total Operations** | **10** | **25** | **96** | **<1** | **19** | **5** |

*Source: DKA Planning 2016, based on CalEEMod 2013.2.2 model runs. Refer to Appendix C.*

Sensitive receptors in the vicinity of the Project site include the following:

- Lily School; a preschool and kindergarten at 610 Kingsley Drive, directly west of the Project site, abutting the existing parking lot.
- LA Medical Center, 3663 West 6th Street, approximately 85 feet north of the Project site across 6th Street.
- Ardmore Riviera, a multi-family residential building at 628 Ardmore, approximately 92 feet east of the Project site across Ardmore.
- 620 Ardmore Avenue, a multi-family residential building at 628 Ardmore, approximately 115 feet east of the Project site across Ardmore.
- St. Basil Church Rectory, 637 Kingsley Drive, approximately 260 feet west of the Project site.

**Project Impacts**

***Construction***

*Regional*

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2013.2.2 model using assumptions provided by the Project's developer, including the Project's construction schedule of 29

months. Key assumptions include export of 48,000 cubic yards of soils; demolition phase (65 days), grading phase (66 days), construction phase (521 days), and architectural coatings phase (86 days).

As shown on Table IV-4, construction of the Project would not produce VOC, $NO_X$, CO, $SO_X$, $PM_{10}$ and $PM_{2.5}$ emissions in excess of the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, Project impacts associated with construction-related regional emissions would be less than significant.

*Local*

In terms of local air quality, the Project would not produce pollutant emissions in excess of the SCAQMD's recommended localized standards of significance for $NO_2$ and CO during the construction phase. However, construction activities would produce $PM_{10}$ and $PM_{2.5}$ emissions that could exceed localized emissions thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the Project's grading phases. However, implementation of Mitigation Measures 3-1 through 3-6 would reduce the Project's $PM_{10}$ and $PM_{2.5}$ emissions to below SCAQMD's localized emissions thresholds, and no significant construction-related localized emissions impacts would occur. Additionally, although not required to reduce the Project's air quality impacts to less than significant, the following best-practices measures would further reduce the Project's construction-related emissions at the Lily School:

- The Project Applicant shall ensure that construction vehicles avoid, to the extent feasible, travel on streets immediately adjacent to Lily School. The City shall ensure that haul routes are designed to comply with this measure.

- The Project Applicant shall provide for the funding for the replacement of air filters before the start of demolition activities and at manufacturers' recommended intervals during construction in any air conditioning units at Lily School. Filters should have an efficiency rating of 60 percent or more.

- The Project Applicant shall provide advance notification of the Project's anticipated general construction schedule and a specific schedule for site grading and preparation activities. Any earth moving activities shall be scheduled to avoid or minimize overlap with school activities, particularly outdoor play periods.

- The Project Applicant shall provide personnel on a daily basis to wash the playground, lunch areas, and seating areas at Lily School if affected during active grading and earth moving phases of the construction, as coordinated with the appropriate school administrative staff. Washing shall be done at the end of a school day, when possible.

- The Project Applicant shall coordinate with school administrative staff to seal any building leaks adjacent to the construction site.

- The Project Applicant shall provide dense windscreens on chain link fences and gates at Lily School facing the project site to reduce dispersion of any dust plumes from earth moving activities.

**Table IV-4**
**Estimated Daily Construction Emissions - Unmitigated**

| Construction Phase | Pounds Per Day | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| Demolition | | | | | | |
| On-Site Emissions | 3 | 31 | 20 | <1 | 6 | 2 |
| Off-Site Emissions | <1 | 3 | 4 | <1 | 1 | <1 |
| Total Emissions | 3 | 34 | 24 | <1 | 7 | 2 |
| Grading | | | | | | |
| On-Site Emissions | 6 | 56 | 39 | <1 | 9 | 6 |
| Off-Site Emissions | 1 | 16 | 18 | <1 | 2 | 1 |
| Total Emissions | 7 | 72 | 57 | <1 | 11 | 7 |
| Building Construction | | | | | | |
| On-Site Emissions | 4 | 33 | 24 | <1 | 2 | 2 |
| Off-Site Emissions | 1 | 3 | 18 | <1 | 3 | 1 |
| Total Emissions | 5 | 36 | 42 | <1 | 5 | 3 |
| Architectural Coatings | | | | | | |
| On-Site Emissions | 32 | 6 | 6 | <1 | <1 | <1 |
| Off-Site Emissions | <1 | <1 | 2 | <1 | <1 | <1 |
| Total Emissions | 32 | 6 | 6 | <1 | <1 | <1 |
| | | | | | | |
| Maximum Regional Total | 32 | 72 | 57 | <1 | 11 | 7 |
| Regional Significance Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Exceed Threshold? | No | No | No | No | No | No |
| | | | | | | |
| Maximum Localized Total | 32 | 56 | 39 | <1 | **9** | **6** |
| Localized Significance Threshold | -- | 74 | 680 | -- | **5** | **3** |
| Exceed Threshold? | No | No | No | No | **Yes** | **Yes** |

*Source: DKA Planning, 2016. Refer to Appendix C. Based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles source receptor area.*

***Operation***

The Project would produce long-term regional emissions, primarily from traffic generation. The Project could add up to 506 net vehicle trips to and from the Project site on a peak weekday at the start of operations in 2017.[6] However, as shown on Table IV-5, the Project's operational emissions would not

[6] *Raju Associates, Inc., Traffic Study for the Wilshire Tower Mixed-Use Project; January 2015.*

exceed SCAQMD's regional significance thresholds for VOC, $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$ emissions. Therefore, Project impacts related to operational regional emissions would be less than significant.

With regard to localized emissions, the Project would emit minimal emissions of $NO_2$, CO, $PM_{10}$, and $PM_{2.5}$ from area and energy sources on-site. As shown on Table IV-5, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. Therefore, Project impacts related to localized operational emissions would be less than significant.

**Table IV-5**
**Estimated Daily Project Operational Emissions**

| Emissions Source | Pounds Per Day | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area Source | 14 | <1 | 36 | <1 | <1 | <1 |
| Energy Source | <1 | 1 | <1 | <1 | <1 | <1 |
| Mobile Source | 12 | 39 | 154 | <1 | 31 | 9 |
| **Total Operational Emissions** | 26 | 40 | 190 | 1 | 33 | 9 |
| **Less Existing Emissions** | -10 | -25 | -96 | -<1 | -19 | -5 |
| **Net Operational Emissions** | **16** | **15** | **94** | **1** | **14** | **4** |
| *SCAQMD Threshold* | *55* | *55* | *550* | *150* | *150* | *55* |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Net Localized Total** | **14** | **1** | **36** | **<1** | **<1** | **<1** |
| *SCAQMD Threshold* | - | **80** | **498** | - | **4** | **1** |
| **Exceed Threshold?** | N/A | No | No | N/A | No | No |

*Source: DKA Planning, 2016. Refer to Appendix C.*

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

**Less Than Significant With Mitigation Incorporated.** The SCAQMD's *CEQA Air Quality Handbook* identifies several methods to determine the cumulative significance of land use projects (i.e., whether the contribution of a project's emissions is cumulatively considerable). However, the SCAQMD no longer recommends the use of these methodologies. Instead, the SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[7]

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

The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As discussed in response to Checklist Question 3b, with implementation of Mitigation Measures 3-1 through 3-6, the Project would not produce pollutant emissions in excess of SCAQMD's significance thresholds. As such, the Project's contribution to cumulative pollutant emissions would not be considerable.

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

**Less Than Significant With Mitigation Incorporated**. As discussed previously, sensitive receptors in the vicinity of the Project site include the following:

- Lily School; a preschool and kindergarten at 610 Kingsley Drive, directly west of the Project site, abutting the existing parking lot.
- LA Medical Center, 3663 West 6th Street, approximately 85 feet north of the Project site across 6th Street.
- Ardmore Riviera, a multi-family residential building at 628 Ardmore, approximately 92 feet east of the Project site across Ardmore.
- 620 Ardmore Avenue, a multi-family residential building at 628 Ardmore, approximately 115 feet east of the Project site across Ardmore.
- St. Basil Church Rectory, 637 Kingsley Drive, approximately 260 feet west of the Project site.

As discussed in response to Checklist Question 3b, in terms of localized emissions, the Project would not produce localized pollutant emissions in excess the SCAQMD's recommended localized standards of significance for $NO_2$ and CO during the construction phase. However, construction activities would produce localized $PM_{10}$ and $PM_{2.5}$ emissions that could exceed localized emissions thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the Project's grading phases. However, implementation of Mitigation Measures 3-1 through 3-6 would reduce the Project's $PM_{10}$ and $PM_{2.5}$ emissions to below SCAQMD's localized emissions thresholds, and the Project's construction activities would not expose sensitive receptors to pollutant emissions in excess of SCAQMD's significance threshold. Impacts would be less than significant.

SCAQMD recommends an evaluation of potential localized CO impacts when vehicle-to-capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse, and/or when the LOS for an intersection worsens from C to D or worse. Traffic volumes that meet these

criteria have the potential to result in CO "hotspots." Based on the traffic study for the Project, Project-related traffic volumes would not meet these criteria at either of the study intersections (refer to response to Checklist Question 16a). Thus, Project traffic would not have the potential to result in CO hotspots. Additionally, as discussed in response to Checklist Question 3b, the Project would not produce operational VOC, $NO_X$, CO, $SO_X$, $PM_{2.5}$, and $PM_{10}$ emissions in excess of SCAQMD's significance thresholds. As such, operation of the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant.

**e) Would the project create objectionable odors affecting a substantial number of people?**

**No Impact**. The Project includes development of a mixed residential and retail building on the Project site and would not generate any odors. Trash receptacles for the Project would be located indoors and as such, odors from trash would be contained within the trash area. Therefore, the Project would not create objectionable odors affecting a substantial number of people.

**Mitigation Measures (Air Quality)**

To ensure that the Project would not result in any significant construction-related air quality impacts, the following mitigation measures are required (refer to Table IV-6):

3-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce $NO_x$, $PM_{10}$, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

3-2: Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year $NO_x$ emissions requirements.

3-3: At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

3-4: Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road- diesel-engines&parent=vehicle-engine-upgrades.

3-5: Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in the Final MND.
- All materials transported off-site shall be securely covered. □
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less. □

**Table IV-6**
**Estimated Daily Construction Emissions - Mitigated**

| Construction Phase | Pounds Per Day | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| Demolition | | | | | | |
| On-Site Emissions | 1 | 7 | 19 | <1 | 2 | 1 |
| Off-Site Emissions | <1 | 3 | 4 | <1 | <1 | <1 |
| Total Emissions | 1 | 10 | 23 | <1 | 2 | 1 |
| Grading | | | | | | |
| On-Site Emissions | 1 | 8 | 34 | <1 | 3 | 2 |
| Off-Site Emissions | 1 | 16 | 18 | <1 | 1 | <1 |
| Total Emissions | 2 | 24 | 52 | <1 | 4 | 2 |
| Building Construction | | | | | | |
| On-Site Emissions | 1 | 9 | 24 | <1 | <1 | <1 |
| Off-Site Emissions | 1 | 3 | 18 | <1 | 2 | 1 |
| Total Emissions | 2 | 12 | 42 | <1 | 2 | 1 |
| Architectural Coatings | | | | | | |
| On-Site Emissions | 32 | <1 | 5 | <1 | <1 | <1 |
| Off-Site Emissions | <1 | <1 | 2 | <1 | <1 | <1 |
| Total Emissions | 32 | <1 | 7 | <1 | <1 | <1 |
| | | | | | | |
| Maximum Regional Total | 32 | 24 | 52 | <1 | 4 | 2 |
| Regional Significance Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Exceed Threshold? | No | No | No | No | No | No |
| | | | | | | |
| Maximum Localized Total | 32 | 9 | 34 | <1 | 3 | 2 |
| Localized Significance Threshold | -- | 74 | 680 | -- | 5 | 3 |

**Table IV-6**
**Estimated Daily Construction Emissions - Mitigated**

| | | | | | | |
|---|---|---|---|---|---|---|
| Exceed Threshold? | No | No | No | No | No | No |

*Source: DKA Planning, 2016. Refer to Appendix C. Based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles source receptor area.*

3-6: All diesel-fueled commercial heavy- and medium-duty vehicles shall comply with CARB's regulations limiting idling (Title 13 Section 2485). This includes no idling of primary diesel engines for more than five minutes and not using diesel-fueled auxiliary power systems to power cab functions (e.g., heating, air conditions) for more than five minutes when within 100 feet of restricted areas.

# 4. BIOLOGICAL RESOURCES

**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 regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** The Project site is located in an urbanized area of the City and is surrounded by existing urban development. The site is developed with commercial structures and surface parking and does not support any sensitive species. However, the Project site contains 13 trees, six of which would be removed as part of the Project (refer to the Street Tree Report in Appendix C). Depending on the time of year that the Project site is developed, nesting birds (which are protected by law) could be using the trees on the Project site. However, the Project Applicant would be required to comply with the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which limit tree removal to outside of nesting season or pre-construction surveys for nesting birds to ensure that no significant impacts related to nesting birds would occur. Therefore, impacts related to this issue would be less than significant.

**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.** The Project site is located in an urbanized area of the City. The site is developed with commercial structures and surface parking and does not contain any riparian habitat or sensitive natural community. Therefore, no impacts related to this issue would occur.

**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.** The Project site is located in an urbanized area of the City. The site is developed with commercial structures and surface parking and does not contain any wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board under the Clean Water Act. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site is located in an urbanized area of the City and is surrounded by existing urban development. The site is developed with commercial structures and surface parking and is in an area not used as a significant wildlife corridor. Additionally, there are no waterways in the Project area that are used by migratory fish, and there are no wildlife nursery sites in the area. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites, and no impacts related to this issue would occur

**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 With Mitigation Incorporated.** No oak trees or other protected trees are located on or adjacent to the Project site (refer to Tree Study in Appendix D). Thirteen street trees are located adjacent to the Project site, six of which would be removed as part of the Project. However, as required by the City of Los Angeles (the "City") and as outlined in Mitigation Measure 4-1, the street trees would be replaced on the Project site at a 1:1 ratio. Therefore, with implementation of this mitigation measure, the Project would not result in any significant impacts related to trees.

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

**No Impact.** The Project site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

**Mitigation Measures (Biological Resources)**

To ensure that the Project would not result in any significant impacts to biological resources, the following mitigation measures are required:

***4-1: Non-Protected Street Trees***

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

- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the Project 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 planning of any tree in the public right-of-way shall require approval of the Board of Public Works. All trees in the public right-of-way shall be provided in the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

# 5. CULTURAL RESOURCES

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

**No Impact.** No buildings on the Project site are listed in a local, state, or national register. The *Intensive Historic Resources Survey of the Wilshire Center and Koreatown Recovery Redevelopment Area* conducted by the City and the Community Redevelopment Agency in 2009 did not designate any of the buildings on the Project site as being eligible or potentially eligible for designation as significant historical resources. The 2015 SurveyLA evaluation of potentially historical resources of the Wilshire Community Plan area did not resurvey the area surveyed in the 2009 survey. As such, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the Project.

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

**Less Than Significant Impact.** The Project site is vacant and does not contain any structures. Based on a records search conducted by the South Central Coast Information Center (refer to Appendix E), no archaeological sites have been recorded within the Project site. However, it is possible that unknown

archaeological resources could exist at the Project site, given that significant archaeological resources have been identified in the Los Angeles area. As such, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown archaeological resources would be less than significant.

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

**Less Than Significant Impact.** A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project site (refer to Appendix E). The records search revealed that no paleontological resources are known to exist at the Project site. However, fossils have been found in the sedimentary deposits that exist within the Project area and at the Project site. Thus, it is possible that unknown resources could be encountered during the Project's excavation phase. However, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project site. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a professional paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. However, construction activities could continue in other areas of the Project site. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with State Law. Through compliance with these requirements, potential Project impacts to unknown paleontological resources or sites, or unique geologic features would be less than significant.

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

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

**e) Cause a substantial adverse change in the significance of a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or determined eligible for listing on the California register of historical resources, listed on a local historical register, or otherwise determined by the lead agency to be a tribal cultural resource?**

**Less Than Significant Impact.** Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period on March 11, 2016. A letter was received, dated April 11, 2016, from the Soboba Band of Luiseno Indians requesting that an approved Native American Monitor(s) be present during future ground disturbance. However, the letter also indicates that the Soboba Band wishes to defer to the Gabrieleno Tribal Consultants due to the tribes closer proximity to the Project site. No comments were received from the Gabrieleno Tribe or any other Native American tribe during the 30-day comment period. As discussed previously, prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project site. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. However, construction activities could continue

in other areas of the Project site. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. Through compliance with these requirements, potential Project impacts to unknown tribal resources would be less than significant.

# 6. GEOLOGY AND SOILS

**a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

**No Impact.** The Project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project site.[8] Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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 on the Project site. Therefore, no significant impacts related to this issue would occur.

**b) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

**Less Than Significant Impact.** Given the Project site's location in a seismically active region, the Project site could experience seismic groundshaking in the event of an earthquake. The fault closest to the Project site is the Puente Hills Blind Thrust Fault, located approximately 0.523 kilometers to the north of the Project site. However, the Project Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in a Final Geotechnical Report prepared for the Project. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event and thus, not cause or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, Project impacts related to groundshaking would be less than significant.

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[8] *Geotechnical Engineering Investigation, Pacific Geotech, Inc., January 8, 2014 (refer to Appendix D).*

**c) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**

**No Impact.** The State's Seismic Hazards Map does not classify the Project site as part of the potentially "Liquefiable" area.[9] This determination is based on groundwater depth records, earth material types and distance to a fault capable of producing a substantial earthquake. The Project site is underlain by bedrock, which is not susceptible to liquefaction. As such, liquefaction potential for the subject site is considered low. Therefore, no significant impacts related to liquefaction would occur as a result of the Project.

**d) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

**No Impact.** The probability of seismically-induced landslides occurring at the Project site is considered low due to the relatively flat elevation of the Project site and adjacent areas. Therefore, no impacts related to landslides would occur as a result of the Project.

**e) Would the project result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with

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[9] *Ibid.*

impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion would occur as a result of Project operation.

**f) 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.** As discussed previously, the Project Applicant would be required to prepare (or have prepared) a Final Geotechnical Report that would address the building standards and recommendations that shall be followed in order to develop the Project building in accordance with building standards that apply to building within the types of soils found at the site, including areas prone to landslide. Through compliance with the City's building code and recommendations of a Final Geotechnical Report, impacts related to soil instability would be less than significant.

**g) Would the project be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

**Less Than Significant Impact.** According to Pacific Geotech, Inc., (refer to Appendix F), testing of the soils at the site showed a low potential for expansion. As stated previous, the Project Applicant would be required to prepare (or have prepared) a Final Geotechnical Report that would address the building standards and recommendations that shall be followed in order to develop the Project building in accordance with building standards that apply to building within the types of soils found at the site. Through compliance with the City's building code and recommendations of a Final Geotechnical Report, impacts related to expansive soils would be less than significant.

**h) 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 would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur.

## 7. GREENHOUSE GAS EMISSIONS

**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.** The modeling results for the analysis below are included in Appendix G.

**Background**

Various gases in the Earth's atmosphere, classified as atmospheric GHG emissions, play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHG emissions are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHG emissions that contribute to the greenhouse effect include the following:

- Carbon Dioxide ($CO_2$) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. $CO_2$ emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. $CO_2$ comprises over 80 percent of GHG emissions in California.[10]

- Methane ($CH_4$) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[11]

- Nitrous Oxide ($N_2O$) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of $N_2O$ emissions.[12] $N_2O$ emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

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[10] *California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.*

[11] *United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).*

[12] *United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001.*

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- Sulfur Hexafluoride ($SF_6$) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of $SF_6$ are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[13] As illustrated on Table IV-7, the other GHG emissions are less abundant but have higher GWP than $CO_2$. To account for this higher potential, emissions of other GHG emissions are frequently expressed in the equivalent mass of $CO_2$, denoted as $CO_2e$. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only $CO_2$ were being emitted. High GWP gases such as HFCs, PFCs, and $SF_6$ are the most heat-absorbent.

**Table IV-7**
**Global Warming Potential for Greenhouse Gases**

| Greenhouse Gas | Global Warming Potential (100-Year) |
|---|---|
| Carbon Dioxide ($CO_2$) | 1 |
| Methane ($CH_4$) | 28 |
| Nitrous Oxide ($N_2O$) | 265 |
| Perfluorocarbons (PFCs) | 7,000-11,000 |
| Hydrofluorocarbons (HFCs) | 100-12,000 |
| Sulfur Hexafluoride ($SF_6$) | 23,500 |
| *Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.* | |

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood

[13] *California Air Resources Board, Climate Change Emission Control Regulations, 2004.*

events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (the "Strategy") analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations include the following:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and

- Inclusion of climate change impact information into fire program planning by State fire fighting agencies.

**Regulatory Setting**

***International***

*Kyoto Protocol*

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the "U.S.") joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (the "UNFCCC") agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11$^{th}$ session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement would be signed into law on April 22, 2016 and would require ratification by 55 countries representing 55 percent of emissions.

*The Western Regional Climate Action Initiative (WCI)*

The Western Regional Climate Action Initiative (the "WCI") is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

***Federal***

The U.S. Environmental Protection Agency (the "USEPA") has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[14] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants. These proposals are undergoing the rulemaking process as of Fall 2013.

*Vehicle Standards*

Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (the "NHTSA") joint rulemaking for vehicle standards.

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[14] *Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])*

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.[15]

- On May 7, 2010, the USEPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.[16]

- On August 9, 2011, USEPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.[17]

- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.[18]

- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.[19]

*Energy Independence and Security Act (the "EISA")*

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

2. Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for

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[15] *NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.*

[16] *USEPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.*

[17] *Available http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf. Accessed November 2011.*

[18] *NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.*

[19] *USEPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: http://www.epa.gov/otaq/climate/documents/420f11031.pdf. Accessed November 2011.*

consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

3. While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

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

***State***

*Assembly Bill 1493*

California has adopted a series of laws and programs to reduce emissions of GHG emissions into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

*Executive Order S-3-05*

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (the "Cal EPA") formed a Climate Action Team (CAT) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[20] Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.[21] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies

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[20] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

[21] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.*

develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

*Executive Order B-30-15*

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[22]

*Assembly Bill 32*

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[23] On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. CARB also developed a mandatory

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[22] *Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).*

[23] *California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.*

reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of $CO_2$ per year and make up 94 percent of the point source $CO_2$ emissions in California.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG 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. An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. 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.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[24] CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[25] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

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

[25] *California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed June 2015.*

On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 $MMTCO_2e$ 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.[26,27]

As shown on Table IV-8, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

**Table IV-8**
**Emission Reductions Needed to Meet AB 32 Objectives in 2020**

| Sector | Million Metric Tons of $CO_2e$ Reduction | Percent of Statewide $CO_2e$ Inventory | Summary of Recommended Actions |
|---|---|---|---|
| Energy | -25 | -4.9% | Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities |
| Transportation | -23 | -4.5% | Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy |
| High Global Warming Potential | -5 | -1.0% | Reduce use of high-GWP compounds from refrigeration, air |

[26] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]*

[27] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

| | | | |
|---|---|---|---|
| | | | conditioning, aerosols |
| Waste | -2 | -0.4% | Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills |
| Cap and Trade Reductions | -23 | -4.5% | Statewide program that reduces emissions from regulated entities through performance-based targets |
| **Total** | **-78** | **-15.3%** | |
| *Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.* | | | |

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

*Cap And Trade*

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons $CO_2e$ per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons $CO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more

than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,[28] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[29] However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[30] The "expected completion date" for this recommended action is 2017.[31] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

*Senate Bill 1368*

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

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[28] *California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.")*

[29] *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

[30] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

[31] *Id.*

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (the "OPR") to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

*State Bill 375*

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (the "RTP") that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375

does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[32]

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of $CO_2e$ per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[33] There is currently no timetable for finalized thresholds.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[34] For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—CARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets.[35]

*Title 24 Energy Efficiency Standards*

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

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[32] *American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841, accessed March 30, 2009.*

[33] *California Air Resources Board. http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf*

[34] *California Air Resources Board. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375. http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf*

[35] *CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

*California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development.

***Regional***

*SCAQMD Recommendations for Significance Thresholds*

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of $CO_2$ equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions which recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects, additionally the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these

thresholds.[36] In the meantime, the project level thresholds are used as a non-binding guide; GHG emissions would be considered potentially significant in the absence of mitigation measures.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

*SCAG Regional Transportation Plan/Sustainable Communities Strategy*

SCAG's adopted its 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") on April 4, 2012. The RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled (VMT) and thereby reduce GHG emissions from personal vehicles. To conduct required modeling analysis for the 2012-2035 RTP/SCS, SCAG distributes the growth forecast to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and transportation. The TAZ level maps have been developed for the purpose of modeling performance only.[37] The growth and land use assumptions are to be adopted at the jurisdictional level.[38] Further, it is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations…to be consistent with the regional transportation plan or an alternative planning strategy."[39]

The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development and transportation.[40] It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Example GHG emissions reduction measures include the following:

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[36] *SCAG, Final PEIR for the 2012-2035 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf*

[37] *Southern California Association of Governments, 2012-2035 Regional Transportation Plan Sustainable Communities Strategy, p. 124.*

[38] *Ibid.*

[39] *California Gov't. Code §65080(b)(2)(E).*

[40] *Southern California Association of Governments, Final PEIR, 2012-2035 RTP/SCS, Appendix G: http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.*

- **GHG1**: SCAG member cities and the county governments may adopt and implement Climate Actions Plans (CAPS, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions).

- **GHG2**: Project sponsors may require Best Available Control Technology (BACT) during construction and operation of projects, including:

    a) Solicit bids that include use of energy and fuel-efficient fleets;

    b) Solicit preference construction bids that use BACT, particularly those seeking to deploy zero- and/or near zero emission technologies;

    c) Employ use of alternative fueled vehicles;

    d) Use lighting systems that are energy efficient, such as LED technology;

    e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;

    f) Streamline permitting process to infill, redevelopment, and energy-efficient projects;

    g) Use an adopted emissions calculator to estimate construction-related emissions;

    h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible;

    i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;

    j) Use of lighter-colored pavement where feasible;

    k) Recycle construction debris to maximum extent feasible; and

    l) Plant shade trees in or near construction projects where feasible.

- **GHG3**: Local jurisdictions can and may establish a coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.

- **GHG4**: Pedestrian and Bicycle Promotion: Local jurisdictions may work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.

- **GHG5**: Waste Reduction: Local jurisdictions can and may organize workshops on waste reduction activities for the home or business, such as backyard composting, or office paper recycling, and may schedule recycling drop-off events and neighborhood chipping/mulching days.

- **GHG6**: Water Conservation: Local jurisdictions may organize support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

- **GHG7**: Energy Efficiency: Local jurisdictions may organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency.

- **GHG8**: Schools Programs: Local jurisdictions may develop and implement a program to present information to school children about climate change and ways to reduce GHG emissions, and may support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling.

*Local*

In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos.

The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[41] Larger projects must be certified at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[42] The City's ordinance affects the following types of development:[43]

- New non-residential building or structure of 50,000 gross square feet or more of floor area;

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[41] *City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).*

[42] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.*

[43] *Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.*

- New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;
- New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;
- The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;
- The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

*Section 99.04.304.1. Irrigation Controllers.* When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

*Section 99.04.303.4. Wastewater Reduction.* Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals)
2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

*Section 99.04.304.2. Outdoor Potable Water.* Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

*Section 99.04.304.3. Irrigation Design.* Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

*Section 99.05.407.1. Weather Protection.* Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

*Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent.* Comply with Section 66.32 et seq. of the LAMC.

*Section 99.05.408.4. Excavated Soil and Land Clearing Debris.* 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

*Section 99.05.410.1. Recycling by Occupants.* Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

*Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction.* At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheet metal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

*Section 99.05.504.4.6. Resilient Flooring Systems.* For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

**Existing Emissions**

The Project site is currently developed with a 67,733-square-foot medical office, 11,470 square feet of commercial retail uses, and surface parking. As shown on Table IV-9, the existing development site generates approximately 4,990 metric tons of $CO_2e$ annually, with the majority of emissions generated by mobile sources.

**Table IV-9**
**Existing Annual $CO_2e$ Greenhouse Gas Emissions (Metric Tons Per Year)**

| Scenario and Source | $CO_2$ | $CH_4$ | $N_2O$ | $CO_2e$ |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| Area Sources | <1 | 0 | 0 | <1 |
| Energy Sources | 822 | <1 | <1 | 825 |
| Mobile Sources | 3,698 | <1 | 0 | 3,701 |
| Waste Sources | 163 | 10 | 0 | 366 |
| Water Sources | 89 | <1 | <1 | 99 |
| **Total Emissions** | **4,773** | **10** | **<1** | **4,990** |
| *Source: DKA Planning, 2016.* | | | | |

**Methodology**

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (the "Climate Registry") General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[44] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[45] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

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[44] *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf , accessed March 2, 2015.*

[45] *Ibid.*

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[46]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[47] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[48] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and

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[46] *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

[47] *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2015.*

[48] *OPR Technical Advisory, p. 5.*

comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[49]

**Significance Criteria**

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a Project's impact on greenhouse gases and climate change applicable to this Project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would do the following:

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

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHG emissions). Further, it states the following:

1. A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:

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

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

    c. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's

[49] *See www.caleemod.com.*

> incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[50] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[51] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project compiles with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[52]

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[50] *Id.*

[51] *Id. (emphasis added).*

[52] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO$_2$e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.*

*See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December*

Although GHG emissions can be quantified, CARB, SCAQMD and the City, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[53] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[54]

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and area all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if the Project is found to be consistent with the following applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan
- SCAG's Sustainable Communities Strategy; and
- City of Los Angeles Green Building Ordinance.

**Construction Phase Impacts on Climate Change**

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site. These emissions would vary day to day over the 29-month duration of construction activities. As illustrated on Table IV-10, construction emissions of $CO_2$ would peak in 2017, when up to 17,565 pounds of $CO_2e$ per day are anticipated following implementation of Mitigation

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*2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).*

[53] *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2 .*

[54] *14 CCR § 15064(h)(3).*

Measures 3-1 through 3-6 (refer to Checklist Topic 3, Air Quality). These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD

**Table IV-10**
**Estimated Construction Emissions (Pounds Per Day)**

| Construction Year | $CO_2$ | $CH_4$ | $N_2O$ | $CO_2e$ |
|---|---|---|---|---|
| 2016 | 4,066 | <1 | 0 | 4,081 |
| 2017 | 17,514 | 2 | 0 | 17,565 |
| 2018 | 8,350 | 1 | 0 | 8,370 |
| 2019 | 8,184 | 1 | 0 | 8,203 |
| *Source: DKA Planning 2016, based on CalEEMod 2013.2.2* | | | | |

**Operational Impacts on Climate Change**

GHG emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken [NAT] Scenario). This approach mirrors the concepts used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this IS/MND includes potential emissions under NAT scenario and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with Project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for a project and would not consider site-specific benefits resulting from a proposed mix of uses or close proximity to public transportation. The analysis in this IS/MND establishes the NAT scenario as compliance with the minimum performance level required under Title 24. The NAT scenario also considers state mandates

that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California LCFS).

Emissions calculations for the Project include credits or reductions for the effectiveness of regulatory compliance measures and Project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown on Table IV-11, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 8,267 and 11,842 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 30 percent from the CARB 2020 NAT scenario. The estimated emissions would represent a net 3,277 metric ton increase in annual emissions when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

**Table IV-11**
**Estimated Project Annual $CO_2e$ GHG Emissions (Metric Tons per Year)**

| Scenario and Source | NAT Scenario* | As Proposed Scenario | Reduction from NAT Scenario | Change from NAT Scenario |
|---|---|---|---|---|
| Area Sources | 40 | 40 | - | 0% |
| Energy Sources | 2,431 | 1,410 | -1,021 | -42% |
| Mobile Sources | 8,570 | 6,016 | -2,554 | -30% |
| Waste Sources | 324 | 324 | - | 0% |
| Water Sources | 407 | 407 | - | 0% |
| Construction | 71 | 71 | - | 0% |
| **Total Emissions** | **11,842** | **8,267** | **-3,575** | **-30%** |
| *Net Emissions* | - | *3,277* | *N/A* | *N/A* |

*Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.*

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

*Source: DKA Planning, 2016.*

The analysis in this IS/MND uses the 2014 Revised AB 32 Scoping Plan's statewide goals (i.e., 15.3 percent reduction from NAT) as one approach to evaluate the Project's impact. The methodology is to compare the Project's emissions as the Project is proposed to the Project's emissions if the Project were built using a NAT scenario approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if the Project was constructed with Project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

Although the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT scenario comparison based on the Scoping Plan is appropriate because the Project would contribute to statewide GHG reduction goals. Specifically, the Project site's location in an existing urban setting provides opportunities to reduce transportation-related emissions. First, the Project would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and VMT that no longer are made. Second, the Project would eliminate many vehicle trips because travel to and from the Project site could be captured by public transit and pedestrian travel instead. Finally, the Project would attract existing trips on the street network that would divert to the proposed uses.

As illustrated on Table IV-12, the Project's profile as an urban infill, mixed-use development with proximity to substantial public transit would produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would range from 0-50 percent in reductions from pass-by trips and up to 25 percent reductions from the substantial mode share from public transit. These would result in concomitant reductions in $CO_2e$ emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decision making.

**Table IV-12**
**Daily Vehicle Travel Reductions Associated with the Proposed Project**

| Land Use | Reduction from Internal Capture | Reduction from Pass-By Trips | Reduction from Transit/Walk-In Trips |
|---|---|---|---|
| Apartments | 0% | 0% | 25% |
| Retail | 0% | 50% | 25% |
| *Source: Raju Associates, Inc. "Traffic Study for the Wilshire Tower Mied-Use Project." January 2015.* | | | |

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions, including the following:

- Stationary and Area Sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.

- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

- Building Structures. Operational efficiencies would be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.

- Water and Wastewater Use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

- Major Appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

- Solid Waste Management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the $CO_2$ estimates from mobile sources (particularly $CO_2$, $CH_4$, and $N_2O$ emissions) are likely much greater than the emissions that would actually occur. The methodology used in this analysis assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate, because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHG emissions are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more

walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

**SCAQMD Efficiency Target.** Another method of analyzing the efficacy of, and thereby demonstrating the Project's consistency with the applicable GHG reduction plans and policies is to compare the Project's emissions to the SCAQMD draft efficiency target for 2020. SQAQMD's draft 2020 target for project level analysis is 4.8 metric tons per year of CO2e per service population (i.e., total employees and residents). This methodology is used to analyze consistency with the applicable GHG reduction plans and policies and to demonstrate the efficacy of the measures contained therein, but is not a threshold of significance.

As shown on Table IV-13, the Project would emit about 2.9 $MMTCO_2e$ per service population, an efficiency that is already lower than the SCAQMD's target threshold for 2020. As such, the Proejct would be consistent with the SCAQMD's draft target, thereby further demonstrating the Project's consistency with applicable GHG reduction plans and programs.

**Table IV-13**
**Assessment of Project GHG Emissions with Draft SCAMD Efficiency Target**
**(Metric Tons of $CO_2e$)**

| Category | $CO_2e$ Emissions (2020) |
|---|---|
| Proposed Project | 3,277 |
| Service Population | 1123 |
| Emissions per Service Population with Amortized Emissions | 2.9 |
| SCAQMD Efficiency Target | 4.8 |
| *Source: DKA Planning 2016.* | |

As described throughout this analysis, the Project contains numerous regulatory compliance measures and Project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance.

As a result of this and the analysis of net emissions, the Project's contribution to global climate change would not be "cumulatively considerable" and would be considered less than significant.

**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 Project would contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted in response to Checklist Question 7a, the Project would be consistent with a number of relevant plans and policies that govern climate change.

**Consistency with Executive Orders S-03-05 and B-30-15.**

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the state's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[55,56]

As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

**Consistency with the AB 32 Scoping Plan**

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. Table IV-14 includes an evaluation of the Project's consistency with the AB 32 Scoping Plan to determine whether the Project will result in adverse cumulative impacts to global climate change. The Project would be consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors, including the following:

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[55] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]*

[56] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

**Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[57] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[58]

**Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all would serve to reduce the Project's emissions level.[59]

**Water Sector:** The Project's emissions level would be reduced as a result of further desired enhancements to water conservation technologies.[60]

**Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste would beneficially reduce the Project's emissions level.[61]

**Table IV-14**
**Project Consistency With AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies**

| Strategy | Project Consistency |
|---|---|
| **California Cap-and-Trade Program.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. | **Not Applicable.** The statewide program is not relevant to the Project. |
| **California Light-Duty Vehicle Greenhouse Gas Standards.** Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals. | **Not Applicable.** The development of standards is not relevant to the Project. |
| **Energy Efficiency.** Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California. | **Consistent.** The Project would be designed and constructed to meet Cal Green building standards by including several measures designed to reduce energy consumption. |
| **Renewables Portfolio Standard.** Achieve 33 percent renewable energy mix statewide. | **Consistent.** The Project would utilize energy from the Los Angeles Department |

[57] *CARB, First Update, pp. 37-39, 85, May 2014.*

[58] *CARB, First Update, pp. 40-41, May 2014.*

[59] *CARB, First Update, pp. 55-56, May 2014.*

[60] *CARB, First Update, p. 65, May 2014.*

[61] *CARB, First Update, p. 69, May 2014.*

**Table IV-14**
**Project Consistency With AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies**

| Strategy | Project Consistency |
|---|---|
| | of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy. |
| **Low-Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard. | **Not Applicable.** The statewide program is not relevant to the Project. |
| **Regional Transportation-Related Greenhouse Gases**. Develop regional greenhouse gas emissions reduction targets for passenger vehicles. | **Not Applicable.** The development of regional planning goals is not relevant to the proposed Project. The Project site's infill location near several bus routes (i.e., Metro) and Metro's Red Line stations make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS). |
| **Vehicle Efficiency Measures**. Implement light-duty vehicle efficiency measures. | **Not Applicable.** State agencies are responsible for implementing efficiency measures. |
| **Goods Movement**. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities. | **Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement. |
| **Million Solar Roofs Program**. Install 3,000 MW of solar-electric capacity under California's existing solar programs. | **Neutral.** The Project does not include solar roofs and is not part of the proposed Statewide initiative. |
| **Medium/Heavy-Duty Vehicles**. Adopt medium and heavy-duty vehicle efficiency measures. | **Not Applicable.** State agencies are responsible for implementing efficiency measures. |
| **Industrial Emissions**. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. | **Not Applicable.** This measure addresses industrial facilities. |
| **High Speed Rail**. Support implementation of a high speed rail system. | **Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system. |
| **Green Building Strategy**. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. | **Consistent.** The Project would be designed and constructed to meet Cal Green building standards and would include several measures designed to reduce energy consumption. |
| **High Global Warming Potential Gases**. Adopt measures to reduce high global warming potential gases. | **Not Applicable.** State agencies are responsible for implementing these measures. |
| **Recycling and Waste**. Reduce methane emissions at landfills. Increase waste diversion, composting and other | **Consistent.** As discussed in response to Checklist Question 17f, the Project would |

**Table IV-14**
**Project Consistency With AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies**

| Strategy | Project Consistency |
|---|---|
| beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste. | have a less than significant impact on solid waste facilities. |
| **Sustainable Forests**. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. | **Not Applicable.** Resource Agency departments are responsible for implementing this measure. |
| **Water**. Continue efficiency programs and use cleaner energy sources to move and treat water. | **Consistent.** The Project would use water-efficient landscaping. |
| **Agriculture.** In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020. | **Not Applicable.** The Project would not include agricultural facilities. |
| *Source: DKA Planning, 2016.* | |

Based on this evaluation, the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

***Consistency with SCAG's 2012-2035 RTP/SCS***

At the regional level, 2012–2035 RTP/SCS is an applicable plan that defines strategies for reducing GHG emissions. In order to assess the Project's potential to conflict with 2012–2035 RTP/SCS, this section analyzes the Project's land use profiled for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table IV-15 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2012–2035 RTP/SCS. The Project also would be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS.

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| ***Land Use Actions and Strategies*** | | |
| Coordinate ongoing visioning efforts to build consensus on growth issues among local governments and stakeholders. | SCAG | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on regional growth issues. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| Provide incentives and technical assistance to local governments to encourage projects and programs that balance the needs of the region. | SCAG | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on its advancement of projects and programs that meet regional needs. Furthermore, the Project would support this measure by providing needed housing, employment opportunities, and supportive uses and amenities. |
| Collaborate with local jurisdictions and agencies to acquire a regional fair share housing allocation that reflects existing and future needs. | SCAG<br>Local Jurisdictions<br>HCD | **Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area by providing needed housing within infill sites that are adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers, in furtherance of SB 375 policies. |
| Expand Compass Blueprint program to support member cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair SCAG or the State's expansion of the Compass Blueprint program. The network of streets surrounding the Project site provide sidewalks connected to transit stops to promote alternative transportation. |
| Continue to support, through Compass Blueprint, local jurisdictions and sub-regional COGs adopting neighborhood-oriented development, suburban villages, and revitalized main streets as livability strategies in areas not served by high-quality transit. | SCAG<br>State<br>Local Jurisdictions<br>COGs | **Consistent.** The Project contains neighborhood-oriented, mixed-use development consisting of multi-family residential and neighborhood-serving commercial uses and in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services. |
| Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood | Local Jurisdictions<br>COGs<br>SCAG<br>CTCs | **Consistent.** While the use of alternatively-fueled vehicles by the Project's future residents and occupants is market driven and beyond the direct control or influence of the Project Applicant, the Project would not impair the City's or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots. | | |
| Continue to support, through Compass Blueprint, planning for new mobility modes such as range- limited Neighborhood Electric Vehicles (NEVs) and other alternative fueled vehicles. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, as noted above, the Project would not impair any jurisdiction's ability to encourage the use of alternative-fueled vehicles. |
| Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities. | SCAG<br>State<br>Local Jurisdictions | **Consistent.** The Project would not impair the City's, SCAG's, or the State's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. Additionally, the Project would encourage healthy lifestyles through the provision of ample bicycle parking spaces on-site. The Project would also incorporate measures to reduce air emissions and greenhouse gases, minimize hazards, and ensure water quality. |
| Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education. | Local Jurisdictions<br>SCAG | **Consistent.** The Project would encourage healthy lifestyles through the provision of bicycle parking spaces. |
| Seek partnerships with state, regional, and local agencies to acquire funding sources for innovative planning projects. | Local Jurisdictions<br>SCAG<br>State | **Consistent.** The Project would not impair the City's, SCAG's or the State's ability to seek partnerships in furtherance of funding acquisition. Additionally, the Project would support this measure by providing needed housing and employment opportunities that would serve not just Project residents but the community at large. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the 2012–2035 RTP/SCS Plan Alternative, or that have been formally adopted by any subregional COG that is consistent with regional goals. | Local Jurisdictions | **Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy via consistency with SCAG's 2012–2035 RTP/SCS Plan. |
| Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts. | Local Jurisdictions | **Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy by creating a mixed-use development comprised of complementary uses that offer housing, employment, shopping, recreation, and other community-serving activities and opportunities. |
| Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance. | Local Jurisdictions SCAG | **Consistent.** The Project would create a mixed-use development consisting of multi-family residential and neighborhood-serving commercial uses within one site and in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services. Additionally, the Project includes a range of residential housing sizes and styles to serve the needs of a growing and increasingly diverse population within the City of Los Angeles. |
| Pursue joint development opportunities to encourage the development of housing and mixed-use projects | Local Jurisdictions CTCs | **Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas. | | transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies. |
| Working with local jurisdictions, identify resources that can be used for employing strategies to maintain and assist in the development of affordable housing. | SCAG<br>Local Jurisdictions | **Consistent.** The Project includes a range of residential housing sizes and styles to serve the needs of a growing and increasingly diverse population within the City. |
| Consider developing healthy community or active design guidelines that promote physical activity and improved health. | Local Jurisdictions | **Consistent.** As discussed above, the Project would encourage healthy lifestyles through the provision of bicycle parking. |
| Support projects, programs, policies, and regulations to protect resources areas, such as natural habitats and farmland, from future development. | Local Jurisdictions<br>SCAG | **Not Applicable.** The Project neither protects nor threatens resource areas from urbanization. |
| Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375. | State<br>SCAG | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. In any event, the Project would be consistent with the overarching goal of SB 375 to reduce vehicle miles traveled and the corresponding emission of GHGs. |
| Continue partnership with regional agencies to increase availability of state funding for integrated land use and transportation projects in the region. | State<br>SCAG | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair the ability of SCAG and the State to increase the availability of funding for certain types of projects. |
| Engage in a strategic planning process to determine the critical components and implementation steps for | Local Jurisdictions<br>SCAG | **Consistent.** The Project would not impair the ability of the City and SCAG to engage in strategic planning processes to address recreational/park shortages in existing communities. As previously discussed, the Project is a mixed-use community comprised of |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities. | | complementary uses that offer housing, employment, shopping, recreation, and other community-serving activities and opportunities. |
| Identify and map regional priority conservation areas for potential inclusion in future plans. | SCAG | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair SCAG's ability to implement this action/strategy. |
| Engage with various partners, including CTCs and local agencies, to determine priority conservation areas and develop an implementable plan. | SCAG<br>CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to engage with various partners on issues pertaining to conservation areas. |
| Develop regional mitigation policies or approaches for the 2016 RTP. | SCAG<br>CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to develop regional mitigation policies or approaches for the future 2016 RTP. |
| ***Transportation Network Actions and Strategies*** | | |
| Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies, while engaging local communities in planning efforts. | SCAG<br>CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to perform and support various studies. Furthermore, by combining proposed residential and commercial (retail) uses, the Project would reduce vehicle trips and thus vehicle miles traveled, thereby contributing to a reduction in air pollutant emissions. |
| Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy by providing an on-site circulation network to improve local access, with appropriate design considerations to ensure travel safety and reliability. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| maintenance of the existing transportation network. | | |
| Expand the use of transit modes in our subregions such as BRT, rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** The Project would not impair the ability of SCAG, the CTCs, or the City to expand and extend the use of other transit modes to the Project Site. |
| Encourage transit providers to increase frequency and span of service in TOD/HQTA and along targeted corridors where cost-effective and where there is latent demand for transit usage. | SCAG<br>CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to encourage transit provided to increase the frequency and span of service. |
| Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG, CTCs, or the City to encourage rail interface services. |
| Expand the Toolbox Tuesdays program to include bicycle safety design, pedestrian safety design, ADA design, training on how to use available resources that expand understanding of where collisions are happening, and information on available grant opportunities to improve bicycle and pedestrian safety. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, the Project would neither support nor adversely impact the expansion of Toolbox Tuesday opportunities. |
| Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park space, where | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** The Project represents infill development offering a mixed-use development consisting of multi-family residential and neighborhood-serving commercial uses in close proximity to jobs (including those that may be offered on-site), destinations, and other neighborhood services. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts. | | |
| Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** The Project is a bicycle-friendly, mixed-use development and would provide a distribution of various uses across three properties that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project Site is also located in a High Quality Transit Area as designated by the 2012-205 RTP/SCS. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. By combining these uses, the Project would serve to reduce vehicle trips and thus vehicle miles traveled, thereby contributing to a reduction in air pollutant emissions. |
| Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** All of the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site, thus reducing the number and length of vehicle trips. The Project Site is also located in a High Quality Transit Area as designated by the 2012-205 RTP/SCS. |
| Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** As discussed above, all of the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site. |
| Similar to SCAG's partnership with the City of Los Angeles and LACMTA, offer to all County Transportation Commissions a mutually | SCAG<br>CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. In any event, the Project would not impair SCAG's or the CTCs' ability to offer the mutually-funded study. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| funded, joint first mile/last mile study for each region. | | |
| Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options. | CTCs<br>Local Jurisdictions | **Consistent.** The Project would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, nearly 100 percent of the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site. |
| Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media. | Local Jurisdictions | **Consistent.** The Project would not impair the City's ability to encourage transit fare and other discounts. |
| Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** The Project would not impair the SCAG's, CTCs', or the City's ability to work with transit properties to remove barriers to on-time performance. |
| Develop policies and prioritize funding for strategies and projects that enhance mobility and air quality. | State | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California. |
| Work with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development that fully take advantage of new travel markets and rail travelers. | State | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California. |
| Work with state lenders to provide funding for increased transit service in TOD/HQTA in support of reaching SB 375 goals. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger rail services and an enhanced bikeway network, such as on river trails. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. |
| Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT) in order to both serve and encourage development of compact neighborhood centers. | CTCs<br>Municipal Transit Operators | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are CTCs and Municipal Transit Operators. |
| Work with the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. |
| Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy. | SCAG<br>State | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. Nonetheless, the Project would integrate land use and transportation concerns via development of a mixed-use community with mutually supportive uses, public services, and amenities, in close proximity to the regional roadway network. |
| ***Transportation Demand Management (TDM) Actions and Strategies*** | | |
| Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system. | SCAG | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. |
| Develop comprehensive | SCAG | **Consistent.** The Project would promote the |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| regional active transportation network along with supportive tools and resources that can help jurisdictions plan and prioritize new active transportation projects in their cities. | CTCs<br>Local Jurisdictions | development of a comprehensive regional active transportation network by locating more potential bicycle and pedestrians that would travel using non-motorized transportation modes. |
| Encourage the implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region. | Local Jurisdictions<br>COGs<br>SCAG<br>CTCs | **Not Applicable.** While the City would be the implementing agency for any Complete Streets project, the proposed Project would neither benefit nor adversely affect the implementation of infrastructure that benefits alternative transportation modes. |
| Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes. | SCAG<br>Local Jurisdictions | **Not Applicable.** Future tenants of both the residential and commercial spaces could be encouraged to utilize alternative transportation modes. The inclusion of bicycle parking for future residents will help promote active transportation modes. |
| Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health | Local Jurisdictions | **Not Applicable.** While local governments are responsible for implementing this, the proposed Project would neither benefit nor adversely impact the City's development of infrastructure and education programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place. | | |
| Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options. | Local Jurisdictions CTCs | **Not Applicable.** While local governments are responsible for implementing this, the proposed Project would neither benefit nor adversely impact the City's development of telecommuting programs by employers that reduce congestion and air pollution. |
| Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358). | State SCAG Local Jurisdictions | **Not Applicable.** While local governments are responsible for implementing this, the proposed Project would neither benefit nor adversely impact the City's development of active transportation and alternative fuel vehicle programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution. |
| ***Transportation System Management (TSM) Actions and Strategies*** | | |
| Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system. | SCAG Local Jurisdictions State | **Consistent.** The Project would not impair the ability of SCAG, the City, or the State to work with transportation authorities to increase the efficiency of the existing transportation system. All improvements would be constructed in accordance with LADOT requirements, as appropriate. Further, the Project would mitigate any significant impacts to local and regional roadways to the extent feasible, as required by CEQA. |
| Collaborate with local jurisdictions and subregional COGs to develop regional policies regarding TSM. | SCAG COGs Local Jurisdictions | **Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on the development of regional TSM policies. All Project transportation-related improvements would be developed in consultation with LADOT and/or transit service providers, as appropriate, and constructed in compliance with their respective standards. |
| Contribute to and utilize regional data sources to ensure efficient integration of the transportation system. | SCAG CTCs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. However, the Project traffic analysis is based on a traffic model developed by LADOT as the primary tool for |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| | | forecasting traffic volumes within the City of Los Angeles. In addition, SCAG's regional data, including population, housing, and employment forecasts are used where appropriate throughout this analysis. |
| Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation Systems (ITS). | SCAG<br>Local Jurisdictions | **Consistent.** While not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG or the City to provide TSM strategy training. However, the Project would support transportation system management strategies via the provision of appropriate roadway improvements that meet LADOT requirements, as appropriate. |
| Collaborate with local jurisdictions and subregional COGs to continually update the ITS inventory. | SCAG<br>COGS<br>Local Jurisdictions | **Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory. See the discussion above regarding the Project's support of transportation system management strategies. |
| Collaborate with CTCs to regularly update the county and regional ITS architecture. | SCAG<br>CTCs<br>Local Jurisdictions | **Consistent.** The Project does not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture. |
| Collaborate with the state and federal Government and subregional COGs to examine potential innovative TDM/TSM strategies. | SCAG<br>State<br>COGs | **Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG, the State of California, and the COGs. |
| ***Clean Vehicle Technology Actions and Strategies*** | | |
| Develop a Regional PEV Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California. | SCAG | **Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. |
| Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. | SCAG<br>Local Jurisdictions | **Consistent.** While the acceleration of fleet conversion by the Project's future residents and occupants is market driven and beyond the direct control or influence of the Project applicant, the Project would not impair the City's or SCAG's ability to support subregional strategies in furtherance of that conversion. |

**Table IV-15**
**Project Consistency with SCAG's 2012-2035 RTP/SCS**

| Actions and Strategies | Responsible Party(ies) | Consistency Analysis[a] |
|---|---|---|
| The activities committed in the two subregions are put forward as best practices that others can adopt in the future. | | |

*SCAG = Southern California Association of Governments*
*HCD = California Department of Housing and Community Development*
*COG = subregional council of governments*
*CTCs = county transportation commissions*
*TOD = transit-oriented development*
*HQTA = High Quality Transit Area*
[a] *"Not Applicable" actions/strategies are those that are not identified for implementation by Local Jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the Local Jurisdictions (i.e., the City of Los Angeles) is assessed above.*
*Source: SCAG 2012–2035 RTP/SCS, Chapter 4: Sustainable Communities Strategy, Tables 4.3 through 4.7; April 2012.*

**Consistency with the City of Los Angeles Green Building Ordinance**

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Project would comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development.

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title

24 (2013) standards by at least 10 percent.[62] As such, it would incorporate several design elements and programs that would reduce the carbon footprint of the development, including the following:

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include the following:

    - Reduced parking based on compliance with the City's bicycle parking ordinance.

    - Access to several public transportation lines. This includes nine bus routes operated by the Los Angeles County Metropolitan Transportation Authority (i.e., 18, 20, 66, 206, 207, 209, 710, 720, 757), two by LADOT (DASH Hollywood/Wilshire, DASH Wilshire Center/Koreatown), Santa Monica Big Blue Bus Route 7, and Foothill Transit Route 481. In addition, Metro operates the Purple Line, with the Wilshire/Normandie station one block from the Project site.

    - Located near residential neighborhoods. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes the following:

    - Use of low-emitting paints, adhesives, carpets, coating, and other materials.

    - Equipment and fixtures shall comply with the following where applicable:

        - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.

        - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.

        - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.

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[62] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.*

- Installed tank type water heaters will have an Energy Factor higher than .6.
- Installed tankless water heaters will have an Energy Factor higher than .80.
- Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
- Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit would be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area would be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include the following:

   - A schedule of plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
     - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
     - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.

- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

    - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

    - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. **GHG Emissions Associated with Solid Waste Generation.** The Project would be subject to construction waste reduction of at least 50 percent. In addition, Project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project would be required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include the following:

    - Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

    - Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable state, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

**Cumulative Impacts**

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The state has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction emissions, would be covered by the Cap-and-Trade Program.

Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles Green Building Ordinance.

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from the NAT scenario and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project would be consistent with the approach outlined in CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2012–2035 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project would result in significant VMT reduction in comparison to the NAT scenario and would be consistent with the RTP/SCS.

The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 32 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project also would be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions.

As discussed above, the Project would be consistent with the applicable GHG reduction plans and policies. The NAT scenario comparison and SCAQMD's draft service population target demonstrate the efficacy of the measures contained in these policies. Moreover, although the Project would not directly subject to the Cap and Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program would backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts would not be cumulatively considerable.

# 8. HAZARDS AND HAZARDOUS MATERIALS

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

**No Impact.** The Project includes development of multi-family residential units and retail land uses and would not require routine transport, use, or disposal of hazardous materials. Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, no impacts related to this issue would occur.

**b) Would the project create 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.** A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project (refer to Appendix H) by AEI Consultants (AEI). The purpose of the Phase I ESA was determined if there are any recognized environmental concerns (RECs) associated with the Project site.[63] AEI's Phase I ESA did not find any RECs.

Records on file with the Los Angeles Fire Department (the "LAFD") document investigation, removal, and closure at the Project site of a former 5,000-gallon diesel (heating oil) underground storage tank (UST) in 2002. The tank was located behind the 3545 Wilshire building, on the southwest corner of the current parking lot. In March 2002, the UST was removed under oversight of the LAFD. Soil sampling indicated diesel contamination beneath the tank at 12 feet below ground surface (bgs). A sample from 14 feet bgs was non-detect for total petroleum hydrocarbons (TPH), and impacted soil was removed between 12 and 14 bgs. A concrete pad was removed from beneath the excavated area. The excavation was filled with clean onsite and imported fill, and the area was paved. In a letter dated January 30, 2003, the LAFD indicated that no further action was required at the site. As a result, AEI recommended no further investigation of the Project site.

According to the City of Los Angeles Department of City Planning's Zone Information & Map Access System (ZIMAS) website, the Project site is located near significant oil production areas known as "Methane Zones." Methane Zone sites include properties immediately surrounding gas sources and where testing and mitigation are required by the Department of City Planning. According to review of the California Division of Oil, Gas & Geothermal Resources (DOGGR) map, one plugged oil and gas well is located within the Project site. Due to the potential environmental risk associated with construction in Methane Zones, the Project Applicant would be required to conduct a methane assessment prior to the redevelopment of the Project site in accordance with Division 71 of the Los Angeles Building Code.

Due to the age of the buildings on the Project site (constructed in the 1950s) there is a potential that asbestos-containing materials (ACMs) are present. During AEI's site reconnaissance, all observed suspect ACMs at the Project site were in good condition at that time and are not expected to pose a health and safety concern to the occupants of the Project site at this time. However, based on the potential presence of ACMs, the Project Applicant would be required as part of the Project permitting process to provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating

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[63] *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

that no ACMs are present in the building. If ACMs are found to be present, the ACMs would need to be abated in compliance with SCAQMD's Rule 1403 as well as all other applicable State and Federal rules and regulations, which would ensure that no significant impacts related to ACMs would occur as a result of the Project.

Due to the age of the subject property buildings, there is a potential that LBP is present. During AEIR's site reconnaissance, all observed painted surfaces were in good condition and are not expected to pose a health and safety concern to the occupants of the Project site at that time. However, based on the potential presence of LPB, the Project Applicant would be required as part of the Project permitting process to submit an LBP survey to the Department of Building and Safety. Should LBP paint materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration (OSHA) regulation, which would ensure that no significant impacts related to LPB would occur as a result of the Project.

**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?**

**No Impact.** Several schools are located within one-quarter mile of the Project site, including: Lily Preschool & Kindergarten located directly adjacent to the west, and Wilshire Smiling Tree Preschool and Brawerman Elementary School to the west; Buddie & Mee Friends daycare to the east; Los Angeles High School of the Arts to the southeast; and Yadam & I Children School and Top Learning Center to the south. However, the Project includes development of multi-family residential units and retail land uses would not require routine transport, use, or disposal of hazardous materials. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

**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?**

**No Impact.** The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, landfills with migrating hazardous waste). Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site is not located within two miles of a public airport. The closest airport is LAX located approximately 11.0 miles northwest of the site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

**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 Project site is not located within the vicinity of a private airstrip. The closest airport is LAX located approximately 11.0 miles northwest of the site. Thus, the Project would not result in a safety hazard associated with an airport for people residing or working in the Project area. Therefore, no impacts related to this issue would occur.

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

**Less Than Significant Impact.** The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the project site or surrounding area. The Project buildings would exceed 75 feet in building height and as such, prior to issuance of a building permit, the Project Applicant would be required by the City to develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with this City requirement, Project impacts related to this issue would be less than significant.

**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 is located in a highly urbanized area of the City that is not subject to wildland fires. Therefore, the Project would not 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.

# 9. HYDROLOGY AND WATER QUALITY

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

**No Impact.** The Project includes development of a multi-family residential units and retail land uses and would not have any point-source discharges. Therefore, the Project would have no impact on water quality standards or waste discharge and would not violate any water quality standards or waste discharge requirements. (Other water quality impacts are discussed below.)

**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.** The Project site in its existing condition is completely developed with impervious surfaces such as buildings, parking areas, and paved driveways and walkways. During storm events, nearly all of the storm water that encounters the Project site is directed to the existing local storm drain system. No storm water at the Project site reaches groundwater levels. As such, the Project site is not a source of groundwater recharge. Under the Project, this condition would remain unaltered. Additionally, all water consumption associated with the Project would be supplied by the Metropolitan Water District (MWD) and not from groundwater beneath the Project site. Thus, the Project would have no affect on groundwater supplies or recharge, and no impacts related to this issue would occur.

**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.** During the Project's construction phase, the Project developer would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Project developer would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities.

Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion and siltation during the construction phase. Additionally, during the Project's operational phase, most of the Project site would be developed with impervious surface, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Thus, no significant impacts related to erosion and siltation would occur as a result of Project operation.

**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?**

**Less Than Significant Impact.** As stated previously, given the existing surface site conditions, during storm events, nearly all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not cause flooding on or off site. Therefore, Project impacts related to flooding would be less than significant.

**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.** As stated previously, given the existing surface site conditions, during storm events, nearly all of the stormwater flows from the site to the local streets where the runoff enters the City's storm drain system. The Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the site to not exceed existing rates. Thus, the Project would not increase the runoff from the site entering the City's existing storm drain facilities. As such, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to storm drain capacity would be less than significant.

**f) Would the project otherwise substantially degrade water quality?**

**Less Than Significant Impact.** To address water quality during the Project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control

measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant.

During the Project's construction phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet the City's water quality standards. Therefore, Project impacts related to operational water quality would be less than significant.

**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.** The Project site is not located within a 100-year flood hazard area. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur.

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

**No Impact.** The Project site is not located within a 100-year flood hazard area. Thus, the Project would not place within a 100-year flood hazard area structures that would impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

**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.** The Project site is not located in any area susceptible to floods associated with a levee or dam. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.

**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.** The Project site is not in an area susceptible to seiches, tsunamis, or mudflows. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

# 10. LAND USE AND PLANNING

**a) Would the project physically divide an established community?**

**No Impact.** The Project site is located in an urbanized area of the City and is currently developed. The site is surrounded by existing development and roadways. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

**b) Would the project conflict with any 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?**

**Less Than Significant Impact.** As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project site. Therefore, Project impacts related to land use and planning would be less than significant.

**Regulatory Framework**

***Regional Plans***

*Southern California Association of Governments*

The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy Areas

The Compass Blueprint Growth Vision Report/Compass Blueprint 2% Strategy (the "Compass Blueprint Report"), adopted by SCAG as part of its June 2004 Southern California Compass Growth Vision Report, is an implementing mechanism for the regional growth strategies outlined in the SCAG's 1996 Regional Comprehensive Plan and Guide (the "RCPG"). The Compass Blueprint Report is intended to provide a strategy to accommodate the projected 24 million residents expected to live in the region by 2035, while balancing valuable quality of life goals. The Compass Blueprint Report emphasizes focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable communities, targeting growth around existing and planned transit stations, and preserving existing open space and stable residential areas.

Four principles were established for the Compass Blueprint Report that are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. It is SCAG's intention that decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies are also provided as a way to achieve each of the principles, as summarized below.

- *Principle 1. Improve mobility for all residents.* Strategies to support Principle 1 include: (1) encourage transportation investments and land use decisions that are mutually supportive; (2) locate new housing near existing jobs and new jobs near existing housing; (3) encourage transit-oriented development; and (4) promote a variety of travel choices.

- *Principle 2. Foster livability in all communities.* Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote "people scaled," pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.

- *Principle 3. Enable prosperity for all people.* Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.

- *Principle 4. Promote sustainability for future generations.* Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and (d) utilize "green" development techniques.

The Compass Blueprint Report is a guideline for how and where the Growth Vision can be implemented. It calls for moderate changes to current land use and transportation trends in two percent of the land area

of the region, known as the 2% Strategy Opportunity Areas. These areas are defined as having a high potential to implement projects, plans, and/or policies consistent with the Compass Blueprint Report principles that would result in the greatest progress towards economic, mobility, livability and sustainability benefits to local neighborhoods.

Regional Comprehensive Plan

SCAG has also prepared the 2008 Regional Comprehensive Plan (the "2008 RCP") in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Growth Vision Report and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the RCPG for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the Regional Transportation Plan (the "RTP") (discussed below) and the Compass Blueprint Report.

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for the CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under the SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.

On April 4, 2012, the Regional Council of SCAG adopted the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (the "2012-2035 RTP/SCS"). SCAG updates the RTP/SCS every four years. Through the conduct of a continuing, comprehensive, and coordinated transportation planning process in conformance with all applicable federal and state requirement, SCAG developed and prepared its latest RTP/SCS, the Final 2016-2040 RTP/SCS (the "2016-2040 RTP/SCS"), which sets forth the long-range regional plan, policies and strategies for transportation improvements and regional growth throughout the SCAG region through the horizon year of 2040, includes a regional growth forecast that was developed by working with local jurisdictions using the most recent land use plans and policies and planning assumptions, and a financially constrained plan and a strategic plan. The constrained plan includes transportation projects that have committed, available or reasonably available revenue sources, and thus are probable for implementation. The strategic plan is an illustrative list of additional transportation investments that the region would pursue if additional funding and regional commitment were secured. Such investments are potential candidates for inclusion in the constrained RTP/SCS through future amendments or updates. The strategic plan is provided for information purposes only and is not part of the financially constrained and conforming 2016-2040 RTP/SCS.

The 2016-2040 RTP/SCS includes a financial plan identifying the revenues committed, available or reasonably available to support the SCAG region's surface transportation investments. The financial plan was developed following basic principles including incorporation of county and local financial planning documents in the region where available, and utilization of published data sources to evaluate historical trends and augment local forecasts as needed.

The 2016-2040 RTP/SCS includes a sustainable communities strategy which sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportations measures and policies, if implemented, will reduce the GHG emissions from automobiles and light trucks to achieve the regional GHG targets set by CARB for the SCAG region.

*South Coast Air Quality Management District*

Air Quality Management Plan

The Project is also located within the South Coast Air Basin (Basin) and is, therefore, within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question 3a of this IS/MND.

*Los Angeles County Metropolitan Transportation Authority*

Congestion Management Plan

The Congestion Management Plan (CMP) for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects, which are eligible to compete for state gas tax funds. Within Los Angeles, the Los Angeles County Metropolitan Transportation Authority (Metro) is the designated congestion management agency responsible for coordinating the CMP.

The Project's potential impacts with respect to the CMP are discussed in response to Checklist Question 16b of this IS/MND.

**Local Plans**

*City of Los Angeles*

City of Los Angeles General Plan

The City of Los Angeles General Plan (the "General Plan"), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and

serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

Wilshire Community Plan

The majority of the Wilshire Community Plan Area consists of gently sloping plains and includes about 8,954 acres (about 14 square miles), which is approximately three percent of the total land in the City. The Wilshire Community Plan Area is often referred to as the Mid-City section of Los Angeles. The eastern edge of the approximately 2.5-mile wide by 6-mile long plan area is about 6 miles west of downtown Los Angeles, while the western edge abuts the City of Beverly Hills.

The plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard, and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. Wilshire Community Plan Area is surrounded by the City community plan areas of Hollywood to the north; South Los Angeles and West Adams-Baldwin Hills-Leimert to the south; Silverlake-Echo Park-Elysian Valley and Westlake to the east; and West Los Angeles to the west.

The plan area is generally southwest of the Hollywood Freeway (U.S. 101), which is oriented northwest-southeast across the northeast corner of the Plan Area at Vermont and Rosewood Avenues. The Hollywood Freeway is the only freeway within the Wilshire plan area. The Harbor Freeway (I-110) is located one mile to the east; the Santa Monica Freeway (I-10) is located one mile to the south; and the San Diego Freeway (I-405) is approximately five miles to the west of the community boundaries.

The Metro Red and Purple Line subway also serves the Wilshire Community Plan area, running along portions of Wilshire Boulevard and Vermont Avenue. The Wilshire Community Plan Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major boulevards including Wilshire, Pico, La Cienega, Western and Vermont. The plan area east of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center.

Existing residential land use totals 4,568 acres, including approximately 116,575 dwelling units. The Wilshire Community Plan designates 4,592 acres for residential land uses, accommodating a projected

134,300 dwelling units. The land use designation in the Wilshire Community Plan for the Project site is Regional Center Commercial (refer to Figure II-8 in Section II, Project Description).

Existing commercial land uses comprise 1,054 acres. There is approximately 40,004,300 square feet of existing commercial development. Planned commercial land use as designated in the Community Plan totals 1,129 acres, with a projected developed commercial total of 41,833,820 square feet.

Existing industrial land use is 50 acres. There is approximately 1,527,800 square feet of existing industrial development. Planned industrial land use designated in the Community Plan is 38 acres, with a build-out projection equal to current conditions.

There are 191 acres of land designated as open space. This category represents 2.1 percent of total land acreage in the Wilshire Community. The street pattern in the Wilshire area is primarily a grid. Most of the street network is oriented on primary compass points with few exceptions. Notably, south of Wilshire Boulevard and west of Wilton Place, the street grid shifts uniformly towards a northeast/southwest alignment, while east/west streets shift somewhat to a northwest/southeast orientation.

The Wilshire Community Plan sets forth planning goals and objectives to maintain the community's distinctive character by the following:

- Enhancing the positive characteristics of residential neighborhoods while providing a variety of housing opportunities.
- Improving the function, design and economic vitality of commercial areas.
- Preserving and enhancing the positive characteristics of existing uses that provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.
- Maximizing development opportunities around existing and future transit systems while minimizing adverse impacts.
- Preserving and strengthening commercial developments to provide a diverse job-producing economic base.
- Improving the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements that enhance the appearance of the community.

City of Los Angeles Planning and Zoning Code

All development activity on the Project site is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (the "Zoning Code"). The Zoning Code includes development standards for the various districts in the City. As shown on Figure II-7, in Section II, Project Description, the Project site is currently zoned C4-2 (Commercial

Zone, Height District 2), C2-2 (Commercial Zone, Height District 2), R5-2 (Multiple Dwelling Zone, Height District 2), and P-2 (Automobile Parking Zone, Height District 2).

**Project Impacts**

***Compass Blueprint Report***

The Project's consistency with the Compass Blueprint Report is discussed on Table IV-16. As discussed, the Project would be consistent with applicable land use policies of the Compass Blueprint Report, and Project impacts related to consistency with this report would be less than significant.

**Table IV-16**
**Project Consistency with Applicable Policies of the Compass Blueprint Report**

| Policy | Project Consistency |
|---|---|
| Encourage transportation investments and land use decisions that are mutually supportive. | **Consistent.** The Project would take advantage of existing and proposed transportation investments by redeveloping the Project site with residential and retail uses located near transit and places of employment and retail. |
| Locate new housing near existing jobs and new jobs near existing housing. | **Consistent.** The Project is infill development in the Wilshire Community Plan area and includes housing and employment opportunities near existing transit routes. |
| Encourage transit-oriented development. | **Consistent.** The Project includes development of a mix of residential and retail land uses on a site that is in close proximity to existing bus lines and within 300 feet of the Metro Wilshire/Normandie transit station. Also, the Project would encourage biking due to the inclusion of 652 bicycle parking spaces. |
| Promote a variety of travel choices. | **Consistent.** The Project site is in close proximity to existing bus lines and within 300 feet of the Metro Wilshire/Normandie transit station. Also, the Project would encourage biking due to the inclusion of 652 bicycle parking spaces. |
| Promote infill development and redevelopment to revitalize existing communities. | **Consistent.** The Project is infill development in the Wilshire Community Plan area and includes housing and employment opportunities near existing transit routes. |

**Table IV-16**
**Project Consistency with Applicable Policies of the Compass Blueprint Report**

| Policy | Project Consistency |
|---|---|
| Promote "people-scaled" walkable communities. | **Consistent.** The Project would be a pedestrian-friendly development given its pedestrian access to the Project site from Wilshire Boulevard, Admore Avenue, and 6th Street via landscaped areas that would link the pedestrian to sidewalks, transit lines, the Metro station, and commercial/retail locations in the Project area. |
| Support the preservation of stable single-family neighborhoods. | **Consistent.** The Project site is not zoned for single-family land uses, and no single-family residential neighborhoods are located near the Project site. Also, the Project would not impinge on any existing single-family neighborhoods. |
| Provide a variety of housing types in each community to meet the housing needs of all income levels. | **Consistent.** The Project includes 7 studio units, 125 one-bedroom units, 260 two-bedroom units, and 36 three-bedroom units. |
| Focus development in urban centers and existing cities. | **Consistent.** The Project is infill development in the Wilshire Community Plan area that includes housing and employment opportunities near existing transit routes and other commercial and employment land uses. |
| Utilize "green" development techniques. | **Consistent.** The Project would be designed and constructed in accordance with the City's Green Building Code. |
| Develop strategies to accommodate growth that use resources efficiently, and minimize pollution and greenhouse gas emissions. | **Consistent.** The Project includes development of multi-family residential land uses and retail space, land uses that are allowed under the existing land use designation for the site. The Project is infill development in the Wilshire Community Plan area that includes housing and retail opportunities near existing transit routes and a Metro station. |

*Source: Southern California Association of Governments, Southern California Compass Blueprint 2% Strategy, Southern California Compass Blueprint Growth Vision Report, June 2004.*

*2008 RCP*

A discussion of the Project's consistency with the relevant policies of the 2008 RCP is presented on Table IV-17. As discussed, the Project would be consistent with all of the applicable 2008 RCP policies, and no significant impacts related to consistency with the 2008 RCP would occur.

**Table IV-17**
**Project Consistency with the 2008 RCP**

| Policies | Consistency Discussion |
|---|---|
| **Land Use and Housing** | |
| **LU-4** Local governments should provide for new housing, consistent with State Housing Element law, to accommodate their share of forecast regional growth. | **Consistent.** The Project would provide 428 dwelling units, which would accommodate a share of the forecasted regional growth. |
| **LU-4.1** Local governments should adopt and implement General Plan Housing Elements that accommodate housing needs identified through the Regional Housing Needs Assessment (RHNA) process. Affordable housing should be provided consistent with RHNA income category distributions adopted for each jurisdiction. To provide housing, especially affordable housing, jurisdictions should leverage existing State programs such as HCD's Workforce Incentive Program and density bonus law and create local incentives (e.g., housing trust funds, inclusionary zoning, tax-increment-financing districts in redevelopment areas and transit villages) and partnerships with non-governmental stakeholders. | **Consistent.** As discussed in response to Checklist Question 13a, the Project would provide housing that is consistent with housing needs called out in he RHNA. |
| **LU-6.2** Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC), which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. |
| **Open Space and Habitat** | |
| **OSC-10** Developers and local governments should promote infill development and redevelopment to revitalize existing communities. | **Consistent.** The Project is an infill development in an existing community. |
| **OSC-11** Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, | **Consistent.** The Project would incorporate sustainable building practices to eliminate pollution and reduce waste. As mentioned above, the Project would comply with the CalGreen requirements of the |

**Table IV-17**
**Project Consistency with the 2008 RCP**

| Policies | Consistency Discussion |
|---|---|
| zoning codes and other implementation mechanisms. | California Building Code and the LAGBC. In addition, the Project would reduce VMT by residential units in an area serviced by existing transit and in close proximity to concentrated employment/retail land uses. |
| **OSC-12** Developers and local governments should promote water-efficient land use and development. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code and the LAGBC, which is designed to reduce the Project's energy and water use. |
| **OSC-14** Developers and local governments should implement mitigation for open space impacts through the following activities:<br>• Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space, and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space.<br>• Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements.<br>• Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant impacts. | **Consistent.** The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located on a developed site surrounded by a dense urban environment in the City. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project site. |
| **Water** | |
| **WA-9** Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code and the LAGBC, which is designed to reduce the Project's energy and water use. |
| **WA-11** Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring | **Consistent.** The Project would be required to confirm with LADWP that the capacity of the existing water infrastructure could supply the |

**Table IV-17**
**Project Consistency with the 2008 RCP**

| Policies | Consistency Discussion |
|---|---|
| new infrastructure impacts. | domestic needs of the Project during the construction and operation phases. The Project Applicant would be required to construct any upgrade to the water infrastructure serving the Project site that is needed to accommodate the Project's water consumption needs. |
| **WA-12** Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing water related pricing incentives. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code and the LAGBC, which is designed to reduce the Project's energy and water use. |
| **WA-32** Developers and local governments should purse water management practices that avoid energy waste and create energy savings/supplies. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation, and with the LAGBC, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. |
| **Energy** | |
| **EN-8** Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms:<br>• Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure.<br>• Land use and planning strategies to increase biking and walking trips. | **Consistent.** The Project includes development of multi-family residential land uses and retail space, land uses that are allowed under the existing land use designation for the Project site. The Project is infill development in the Wilshire Community Plan area that includes residential and retail opportunities near existing transit routes. |
| **EN-10** Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:<br>• Using energy efficient materials in building design, construction, rehabilitation, and retrofit.<br>• Encouraging new development to exceed Title 24 | **Consistent.** The Project would meet/exceed Title 24 standards through compliance with the City's Green Building Ordinance. |

**Table IV-17**
**Project Consistency with the 2008 RCP**

| Policies | Consistency Discussion |
|---|---|
| energy efficiency requirements.<br>• Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.<br>• Utilizing efficient commercial/residential space and water heaters: This could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c+Projects.pr_tax_credits.<br>• Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.<br>• Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings.<br>• Encouraging neighborhood energy systems, which allow communities to generate their own electricity.<br>• Orienting streets and buildings for best solar access.<br>• Encouraging buildings to obtain at least 20% of their electric load from renewable energy. | |
| **EN-12** Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources. | **Partially Consistent.** Although the Project is not required to include solar panels, the Project would receive electricity supply from LADWP, which obtains a portion of its electricity supplies from renewable sources. |
| **Solid Waste** | |
| **SW-14** Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:<br><br>• Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.<br>• An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D | **Consistent.** The Project would participate in a demolition and construction waste recycling program as well as an operational recycling program. |

**Table IV-17**
**Project Consistency with the 2008 RCP**

| Policies | Consistency Discussion |
|---|---|
| diversion.<br>• Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap materials through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.).<br>• Reuse of existing building structure and shell in renovation projects.<br><br>Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:<br><br>• Development of indoor recycling program and space.<br>• Design for deconstruction.<br>• Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable components. | |
| *Source: Southern California Association of Governments, Regional Comprehensive Plan, October 2008.* | |

***2016-2040 RTP/SCS***

The Project's consistency with the applicable goals of the 2016-2040 RTP/SCS is discussed on Table IV-18. As discussed, the Project would be consistent with the 2016-2040 RTP/SCS. Therefore, impacts related to consistency with the 2016-2040 RTP/SCS would be less than significant.

**Table IV-18**
**Project Consistency with the 2016-2040 RTP/SCS**

| Goal | Consistency Discussion |
|---|---|
| Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking). | **Consistent.** The Project would reduce VMT by providing a higher density infill development in close proximity to existing transit lines and a Metro station. In addition, the Project would encourage bicycling with the inclusion of 652 bicycle parking spaces. |
| Actively encourage and create incentives for energy efficiency, where possible. | **Consistent.** The Project would comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project |

| | |
|---|---|
| | would meet/exceed Title 24 standards with compliance with the City's Green Building Ordinance and the Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code, which is designed to reduce the Project's energy and water use, reduce waste, and reduce the carbon footprint. |
| Encourage land use and growth patterns that facilitate transit and non-motorized transportation. | **Consistent.** The Project would reduce VMT by providing a higher density infill development in close proximity to existing transit lines and a Metro station. In addition, the Project would encourage bicycling with the inclusion of 652 bicycle parking spaces. |
| *Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2012.* | |

***General Plan (Framework Element)***

The Project's consistency with the General Plan Framework Element land use policies is discussed on Table IV-19. As shown, the Project would be consistent with many of the applicable policies, and Project impacts related to consistency of the Project with the General Plan Framework Element would be less than significant.

**Table IV-19**
**Project Consistency with Applicable Policies of the Framework Element**

| Objective | Project Consistency |
|---|---|
| ***Framework Element: Land Use Chapter*** | |
| **3.2.1** Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations. | **Consistent.** The Project includes development of multi-family residential and retail land uses that are allowed under the existing land use designation for the Project site. The Project is infill development in the Wilshire Community Plan area and includes residential and retail opportunities near existing transit routes and a Metro station. |
| **3.2.2** Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of | **Consistent.** The Project includes development of multi-family residential and retail land uses that are allowed under the existing land use designation for the Project site. The Project is infill development in the |

**Table IV-19**
**Project Consistency with Applicable Policies of the Framework Element**

| Objective | Project Consistency |
|---|---|
| housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations. | Wilshire Community Plan area and includes residential and retail opportunities near existing transit routes and a Metro station. |
| **3.2.3** Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations. | **Consistent.** The Project would be a pedestrian-friendly development given its pedestrian access to the Project site from Wilshire Boulevard, Ardmore Avenue, and 6th Street via landscaped areas that would link the pedestrian to sidewalks, transit lines, a Metro station, and recreational locations in the Project area. Also, the Project includes 652 bicycle parking spaces and a bicycle maintenance room. |
| **3.2.4** Provide for the siting and design of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts. | **Consistent.** The Project includes development of the Project site with multi-family residential and retail land uses that are allowed under the existing land use designation for the Project site. Also, the area immediately surrounding the Project site is developed with a mix of commercial and multi-family residential land uses. |
| **3.7.1** Accommodate the development of multi-family residential units in areas designated in the community plans…with the density permitted for each parcel to be identified in the community plans. | **Consistent.** The existing land use designation for the Project site is Regional Center Commercial, which allows for development of the Project site at the density proposed as part of the Project. |
| **3.7.4** Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 *Urban Form and Neighborhood Design* Chapter of this Element. | **Consistent.** The Project would be required to comply with all current design standards. |
| *Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, April 2016.* | |

### *Wilshire Community Plan*

Consistency of the Project with the applicable policies in the Wilshire Community Plan is discussed on Table IV-20. As discussed, the Project would be substantially consistent with all of the applicable policies. Therefore, Project impacts related to inconsistency of the Project with the Wilshire Community Plan would be less than significant.

**Table IV-20**
**Project Consistency with the Applicable Policies of the Wilshire Community Plan**

| Policy | Consistency Discussion |
|---|---|
| ***Residential*** | |
| 1-1.1 Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life. | **Consistent.** The Project includes development of two mixed-use structures (residential units over ground-floor retail), similar in height and massing to other existing buildings along Wilshire Boulevard in the Project area. Additionally, no single-family/low-density residential neighborhoods are located near the Project site. |
| 1-1.2 Promote neighborhood preservation in all stable residential neighborhoods. | **Consistent.** The Project would promote neighborhood stabilization through infill development of the Project site and replacing the existing commercial land uses and parking on the site with 428 dwelling units and ground-floor retail. None of the residential neighborhoods near the Project site would be affected by the Project. |
| 1-1.3 Provide for adequate Multiple Family residential development. | **Consistent.** The Project includes development of multi-family residential units, consistent with the land use designation for the Project site. |
| 1-2.1 Encourage higher density residential uses near major public transportation centers. | **Consistent.** The Project includes development of 428 multi-family residential dwelling units and ground-floor retail at the Project site, which is in proximity to several transit lines and within 300 feet of a Metro station. |
| 1-3.1 Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods. | **Consistent.** The Project site is located in a fairly densely developed area of the City. The visual character of the Project area is dominated by the mix of low-, mid-, and high-rise residential development. The Project includes demolition and removal of the existing commercial structures on the Project site and development of the site with high-rise residential buildings with ground-floor retail. The scale of the proposed buildings would be consistent with the scale of existing buildings along Wilshire Boulevard. The design, architecture, construction, and landscaping of the Project would comply with the City's design requirements for mixed-use buildings and the Project would be compatible with the existing residential land uses within the area. |
| 1-3.2 Support historic preservation goals in neighborhoods | **Consistent.** No significant historical resources would |

**Table IV-20**
**Project Consistency with the Applicable Policies of the Wilshire Community Plan**

| Policy | Consistency Discussion |
|---|---|
| of architectural merit and/or historic significance. | be affected by the Project. |
| 1-3.4 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets. | **Consistent.** As discussed in response to Checklist Question 16a, an assessment of the Project's impacts related to traffic were analyzed in a Traffic Study. The study concluded that the Project would not result in any significant traffic impacts. |
| 1-4.1 Promote greater individual choice in type, quality, price and location of housing. | **Consistent.** The Project includes development of 428 multi-family residential units – 7 studio units, 125 one-bedroom units, 260 two-bedroom units, and 36 three-bedroom units. |
| 1.4-2 Ensure that new housing opportunities minimize displacement of residents. | **Consistent.** The Project site currently does not contain any residential development. |
| ***Recreation and Park Facilities*** | |
| 4-1.1 Preserve and improve the existing recreational facilities and park spaces. | **Consistent.** The Project is infill development that would include passive and active courtyard spaces, water features, fitness center, and recreation room. |
| ***Police Protection*** | |
| 8-1.1 Consult with the LAPD in the review of development projects and land use changes to determine law enforcement needs and requirements. | **Consistent.** As discussed in response to Checklist Question 14aii, the LAPD was consulted in preparation of this IS/MND. As discussed there, the Project would not result in any significant impacts related to police services. |
| 8-2.3 Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity. | **Consistent.** As discussed in response to Checklist Question 14aii, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits. |
| ***Fire Protection*** | |
| 9-1.1 Coordinate with the City of Los Angeles Fire Department during the review of significant development | **Consistent.** As discussed in response to Checklist Question 14ai, the LAFD was consulted in |

**Table IV-20**
**Project Consistency with the Applicable Policies of the Wilshire Community Plan**

| Policy | Consistency Discussion |
|---|---|
| projects and General Plan amendments affecting land use to determine the impacts on service demands. | preparation of this IS/MND. As discussed there, the Project would not result in any significant impacts related to fire protection services. |
| ***Transportation*** | |
| 10-1.2 Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled people, students, and low-income, transit-dependent populations. | **Consistent.** The Project site is served by several transit lines and is located within 300 feet of the Wilshire/Normandie Metro station. |
| 11-1.4 Support the provision of bicycle facilities in all new development. | **Consistent.** The Project includes 652 bicycle parking spaces and a bicycle maintenance room. |
| 11-2.3 Protect and improve existing pedestrian oriented street segments. | **Consistent.** Pedestrian access to the proposed buildings would be provided at ground level from 6th Street, Ardmore Avenue, and Wilshire Boulevard. |
| 15-1.1 Minimize the number of ingress and egress points to and from all Major Class II and Secondary Highways in the Wilshire Community Plan Area. | **Consistent.** Vehicular access to the Project would be provided via a driveway on 6th Street, allowing right-turn in and right-out access to the parking structure. Two additional driveways on Ardmore Avenue also would provide access to the Project site. The southern of these two driveways would provide inbound access to the retail-related parking spaces on the ground-floor level of the parking structure and two-way access to the upper residential parking levels, while the northern driveway would operate as one-way outbound from the ground-floor parking level. |
| 15-1.2 Develop off-street parking resources, including parking structures and underground parking in accordance with design standards. | **Consistent.** All parking for the Project would be provided in a parking garage on the Project site in accordance with LAMC parking requirements. |
| *Source: Wilshire Community Plan.* | |

### *Zoning Code*

As stated previously, the Project site is currently zoned C4-2 (Commercial Zone, Height District 2), C2-2 (Commercial Zone, Height District 2), R5-2 (Multiple Dwelling Zone, Height District 2), and P-2 (Automobile Parking Zone, Height District 2). The C2-2 and C4-2 Zones permit commercial and multi-

family residential uses. The P-2 Zone permits parking. The R5-2 Zone permits multi-family residential uses; under LAMC Section 12.22.A.18.b, commercial uses are permitted in this zone by conditional use. The Project includes a Vesting Zone Change from C2-2, C4-2, P-2, and R5-2 to C4-2 to allow for a development that conforms to public necessity, convenience, general welfare, and good zoning practice. Such a Vesting Zone Change would create uniform zoning across the entire site, consistent with the Regional Center Commercial land use designation under the General Plan and Wilshire Community Plan. The Vesting Zone Change would also permit construction of a unified, mixed-use development that would be compatible with its surroundings. The current mix of zoning designations assigns different development standards to various portions of the site, complicating realization of a unified development. Most notably, the P-2 zoning designation assigned to two of the site's six lots is particularly restrictive by not allowing uses other than parking. The proposed Vesting Zone Change would allow for urban infill of the Project site with land uses that help achieve important City goals, such as developing high-density projects near transit stations and employment centers to reduce VMT and associated pollutant emissions. The Project would be designed and constructed to conform to all other applicable LAMC standards. Therefore, Project impacts related to zoning would be less than significant.

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

**No Impact.** The Project site is not subject to any applicable habitat conservation plan or natural community conservation plan. Therefore, the Project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

## 11. MINERAL RESOURCES

**a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** The Project site is located in an urbanized part of the City. There are no known mineral resources on the Project site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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

**No Impact.** The Project site is located in an urbanized part of the City. The Project site is not identified as a mineral resource recovery site. Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts related to issue would occur.

# 12. NOISE

**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 With Mitigation Incorporated**. The modeling results for the analysis below are included in Appendix I.

**Characteristics of Sound**

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table IV-21 provides examples of A-weighted noise levels from common sources.

**Noise Definitions**

Community Noise Equivalent Level (CNEL): CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.

Equivalent Noise Level ($L_{eq}$). $L_{eq}$ is the average noise level on an energy basis for any specific time period. The $L_{eq}$ for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. $L_{eq}$ can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

**Effects of Noise**

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

**Table IV-21**
**A-Weighted Decibel Scale**

| Typical A-Weighted Sound Levels | Sound Level (dBA, $L_{eq}$) |
|---|---|
| Threshold of Pain | 140 |
| Jet Takeoff at 100 Meters | 125 |
| Jackhammer at 15 Meters | 95 |
| Heavy Diesel Truck at 15 Meters | 85 |
| Conversation at 1 Meter | 60 |
| Soft Whisper at 2 Meters | 35 |
| *Source: United States Occupational Safety & Health Administration, Noise and Hearing Conversation Technical Manual, 1999.* | |

**Audible Noise Changes**

Small perceptible changes in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely cause some community reaction. A 10-dBA increase is heard as a doubling in loudness and would cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Noise is most audible when traveling by direct line-of-sight.[64] Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

[64] *Line-of-sight is a visual path between the noise source and the noise receptor.*

# REGULATORY SETTING

## Federal

### *Noise Standards*

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project, which is a private development in the City. With regard to noise exposure and workers, the Office of Safety and Health Administration (OSHA) regulations safeguard the hearing of workers exposed to occupational noise.

## State

### *Noise Standards*

The California Department of Health Services (the "DHS") has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown on Table IV-22. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

## City

The LAMC provides two types of noise standards that are relevant to this analysis: 1) construction noise standards, and 2) general noise ordinance standards. The construction noise standards apply only to construction activities, while the general noise ordinance standards apply to noise generated by land use activities.

### *Construction Noise Standards*

LAMC Section 41.40 regulates noise due to construction work. LAMC Section 41.40 prohibits the use of any "power driven drill, riveting machine, excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence" between the hours of 9:00 PM and 7:00 AM. Section 41.40 further states that "the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited" during the hours of 9:00 PM and 7:00 AM. LAMC Section 41.40 also prohibits any construction work, including the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials, within 500 feet of residential buildings before 8:00 AM or after 6:00 PM on Saturday or national holidays or at any time on Sunday.

Within the permitted construction times and distances, there are no noise limits. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempted from the LAMC Section 41.40 standards.

**Table IV-22**
**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 |
| Multi-Family 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, 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 | --- |

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*
[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 needed noise insulation features included in the design.*
[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

*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.*

LAMC Section 112.05 states that between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dB(A) at a distance of 50 feet. This limit applies to construction equipment, including crawler-tractors, dozers, rotary drills

and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors, and pneumatic or other powered equipment. This limit shall not apply where compliance is technically infeasible. The burden of proving that compliance is technically infeasible shall be on the person or persons charged with any violation of this section. Technical infeasibility shall mean that the noise limit cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction devices or techniques during the operation of the equipment.

***General Noise Ordinance Standards***

LAMC Chapter XI, "Noise Regulation," regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, the regulations do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. LAMC Section 111.01 (a) defines the ambient noise as "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured. Ambient noise shall be averaged over a period of at least 15 minutes…" LAMC Section 111.03 provides minimum ambient noise levels for various land uses, as described on Table IV-23. In the event that the actual measured ambient level at a subject location is lower than that provided in the table, the level in the table shall be assumed.

**Table IV-23**
**City of Los Angeles Minimum Ambient Noise Levels**

| Zone | Allowable Average Noise Level ($L_{eq}$) | |
|---|---|---|
| | **Daytime (7 am – 10 pm)** | **Nighttime (10 pm – 7 am)** |
| A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5 | 50 dB(A) | 40 dB(A) |
| P, PB, CR, C1, C1.5, C2, C4, C5, and CM | 60 dB(A) | 55 dB(A) |
| M1, MR1, and MR2 | 60 dB(A) | 55 dB(A) |
| M2 and M3 | 65 dB(A) | 65 dB(A) |
| *Source: LAMC* | | |

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used. The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dB(A).

- For repeated impulsive noise – reduce allowable noise level by 5 dB(A).

- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 AM and 10:00 PM – increase allowable noise level by 5 dB(A).

The City's noise ordinance is not explicit in defining the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes," above, it is concluded that the one-hour $L_{eq}$ metric should be used.

Regarding the location at which the noise measurements should be taken, the LAMC states that "except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."

LAMC Section 112.02 addresses noise from air conditioning, refrigeration, heating, pumping, and filtering equipment. The section states that such equipment may not generate noise that would exceed the ambient noise level at any adjacent property by more than 5 dB(A).

LAMC Section 114.02 addresses noise from motor driven vehicles (the LAMC only addresses vehicles on private property and does not address vehicles on public highways). The section states that such vehicles may not generate noise that would exceed the ambient noise level at any occupied residential property by more than 5 dB(A).

LAMC Section 114.03 states that "It shall be unlawful for any person, between the hours of 10:00 PM and 7:00 AM of the following day, to load or unload any vehicle, or operate any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building."

***Construction Noise***

During demolition, construction, ground clearing, grading, structural, and other Project phases, noise-generating activities would occur at the Project site between the hours of 7:00 a.m. and 9:00 p.m. in accordance with the LAMC. Table IV-24 summarizes estimated noise levels at nearby sensitive receptors during construction. Sensitive receptors near the Project site include the following:

- Ardmore Riviera Apartments, 628 S. Ardmore Avenue; 90 feet east of the Project site.

- Azusa Pacific and Bryan Colleges, 3832 Wilshire Boulevard; 150 feet southwest of the Project site. Both educational facilities are located within the Wilshire Bank tower.

- St. Basil Church Rectory, 637 Kingsley Drive; 260 feet west of the Project site.

- Lily School, 610 Kingsley Drive; 5 feet west of the Project site. The Lily School playground abuts the Project site.

**Table IV-24**
**Construction Noise Levels – Unmitigated**

| Sensitive Receptor | Distance from Site (feet) | Maximum Construction Noise Level (dBA) | Existing Ambient (dBA, $L_{eq}$) | New Ambient (dBA, $L_{eq}$) | Increase |
|---|---|---|---|---|---|
| Ardmore Riviera Apartments | 90 | 81.1 | 62.8 | 81.2 | 18.4 |
| Azusa Pacific and Bryan College | 150 | 76.7 | 73.4 | 78.4 | 5.0 |
| St. Basil Church Rectory | 260 | 68.9 | 63.1 | 69.9 | 6.8 |
| Lily School | 5 | 86.2 | 63.5 | 86.3 | 22.8 |

*Source: DKA Planning, 2016.*

To ascertain current ambient noise levels at nearby receptors, DKA Planning took short-term, 15-minute noise readings on January 18, 2016, using a Quest Technologies SoundPro DL Sound Level Meter.[65] Noise measurements were taken at these four locations near the Project site. Ambient noise levels were primarily a product of motor vehicles traveling on adjacent roadways, including Wilshire Boulevard, Ardmore Avenue, and Kingsley Drive. As shown on Table IV-21, ambient noise levels ranged from 62.8 dBA $L_{eq}$ at the Ardmore Riviera Apartments to 73.4 dBA $L_{eq}$ at Azusa Pacific and Bryan College.

Construction activities would generate noise from a variety of on- and off-site activities over the projected 28 months of Project development, and would include the use of on-site heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries.

For this analysis, construction noise impacts were modeled using the noise reference levels of equipment to be operated during the Project's grading phase, specifically excavators and front-end loaders. Excavators can produce up to 85 dBA of noise at a reference distance of 50 feet; Front-end loaders, 80 dBA.[66] Other

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[65] *The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.*

[66] Federal Highway Administration. *Construction Noise Handbook*, 2006.

construction phases would not require equipment as loud as those required for site grading activities. Therefore, this analysis examines a conservative scenario; the noise impacts of all other construction phases would not exceed those analyzed here.

Given ambient conditions in the neighborhood and the proximity of the receptors, significant noise increases could occur at the four monitoring locations during construction of the Project.

- Ardmore Riviera Apartments are projected to experience noise levels of up to 81.2 dBA, an increase of 18.4 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

- Azusa Pacific and Bryan College are projected to experience noise levels of up to 78.4 dBA, an increase of 5.0 dBA. These elevated noise levels would match the 5 dBA noise increase considered to be a noise violation by the LAMC.

- St. Basil Church Rectory is projected to experience noise levels of up to 69.9 dBA, an increase of 6.8 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

- Lily School is projected to experience noise levels of up to 86.3 dBA, an increase of 22.8 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

Additionally, construction noise levels would exceed the City's 75 dBA limit for powered construction equipment within 500 feet of a residential zone.

As stated previously, pursuant 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 Project would exceed the numerical noise threshold of 75 dBA at 50 feet from the noise source as outlined in the LAMC, implementation of the Mitigation Measures 12-1 through 12-4 would reduce the construction noise levels to below the 75 dBA threshold and would reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible, and temporary and intermittent construction noise levels would be less than significant.

With regard to off-site construction-related noise impacts, a maximum of 35 haul truck trips per day are expected to remove cut materials from the Project site during the Project's grading phase. Haul trucks would transport cut materials 13 miles one-way to Scholl Canyon Landfill via a haul route along Ardmore Avenue, 6$^{th}$ Street, Alvarado Street, 2 Freeway, and 134 Freeway. While such vehicle activity would marginally increase ambient noise levels along local roadways, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at haul route-adjacent receptors. According to the City's "L.A. CEQA Thresholds Guide," a 3 dBA increase in roadway noise levels requires an

approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. Though the addition of heavy duty haul vehicles would alter the fleet mix of the haul route, their minimal addition to local roadways would not nearly double those road's traffic volumes, let alone augment their traffic to levels capable of producing 5.0 dBA increases. The Project's maximum deployment of 35 haul trips per day would only average 2-3 trips per hour over the course of any single day. And, other Project phases would produce even fewer daily haul trips. Therefore, noise impacts related to haul trucks would be less than significant.

***Operational Noise***

During Project operations, the development would produce both direct noise impacts on the site from residential-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include the following:

- Mechanical Equipment. Stationary noises associated with building operations, such as ground-level heating, ventilation, and air conditioning (HVAC) systems, would generate noise levels between 50 and 65 dBA at 50 feet.[67] Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. Based on the distance from the Project site to nearby receptors, the ambient noise levels, and the relatively quiet operation of HVAC systems, increases in ambient noise levels from these on-site noise sources would be inaudible, far below the 5 dBA threshold considered to be a noise violation by the LAMC.

- Landscape Maintenance. Noise generated by lawnmowers and leaf blowers generates about 70 dBA at 5 feet of distance from the source. For each doubling of distance from a point noise source, the sound levels will decrease by 6 dBA or more. These temporary activities will cause short-term increases in noise that would not result in sustained increases in ambient noise levels of 5 dBA or more.

- Restaurant/Retail Land Uses. Noise from recurrent activities (e.g., conversation, amplified music) or non-recurrent activities (e.g., parties) would elevate ambient noise levels to differing degrees. The City's noise ordinance would also provide a means to address nuisances related to restaurant or retail noise.

- Residential Land Uses. There are a variety of recurrent (e.g., consumer electronics, voices) and non-recurrent activities (e.g., social gatherings) that would elevate ambient noise levels for adjacent residences to differing degrees. The City's noise ordinance provides a means to address nuisances that are created because of such occasional, acute noise events.

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[67] *Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.*

- Auto-Related Activities. Operations of the proposed parking garage would introduce recurrent, intermittent noise events, such as door slamming and vehicle engine start-ups. These activities generally produce 60-70 dBA at 50 feet of distance. However, these noise events are infrequent and do not significantly increase ambient noise. Furthermore, similar to the Proposed Project, the existing land-use already consists of a multi-level parking garage accessible by a driveway located on Ardmore Avenue. The Proposed Project's parking facilities are more sizeable than the existing garage, but would nonetheless not increase ambient noise levels at Ardmore Avenue residences by 3 dBA CNEL or to within the "normally unacceptable" land use category for multi-family residences.

These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be less than significant.

The majority of the Project's operational noise impacts would be from indirect noise impacts associated with its 998 net new daily vehicle trips.[68] The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled with FHWA TNM 2.5, comparing an existing year (2015) no Project scenario to an existing year (2015) with Project scenario. As shown on Tables IV-25 and IV-26, the greatest project-related noise increase would be 1.8 dBA along southbound Ardmore Avenue, from 6th Street, during the P.M. peak hour. However, this and all other increases would be inaudible, far below the 5 dBA increase necessary to be considered noticeable by the public at large.

Mobile noise generated by the Project would also not cause ambient noise levels measured at the property lines of affected land uses to rise to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines. As a result, these inaudible, off-site vehicular noise impacts would be less than significant.

**b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common sources of vibration include trains, buses, and construction activities.

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[68] *Raju Associates, Inc., Traffic Study for the Wilshire Tower Mixed-Use Project, January 2015.*

**Table IV-25**
**Estimated AM Peak-Hour Mobile Source Noise Levels**

| Roadway Segment | Estimated dBA, CNEL | | | |
|---|---|---|---|---|
| | No Project (2015) | With Project (2015) | Project Change | Significant Impact? |
| E/B Wilshire Blvd., from Harvard Blvd. | 70.1 | 70.2 | 0.1 | No |
| W/B Wilshire Blvd., to Harvard Blvd. | 69.2 | 69.2 | 0.0 | No |
| N/B Ardmore Ave., to 6th St. | 54.9 | 56.4 | 1.4 | No |
| S/B Ardmore Ave., from 6th St. | 55.4 | 56.4 | 1.0 | No |
| N/B Irolo St., from 7th St. | 65.7 | 65.7 | 0.0 | No |
| S/B Irolo St., to 7th St. | 66.5 | 66.5 | 0.0 | No |

*Source: DKA Planning, 2016.*

**Table IV-26**
**Estimated PM Peak-Hour Mobile Source Noise Levels**

| Roadway Segment | Estimated dBA, CNEL | | | |
|---|---|---|---|---|
| | No Project (2015) | With Project (2015) | Project Change | Significant Impact? |
| E/B Wilshire Blvd., from Harvard Blvd. | 70.2 | 70.3 | 0.1 | No |
| W/B Wilshire Blvd., to Harvard Blvd. | 69.4 | 69.4 | 0.0 | No |
| N/B Ardmore Ave., to 6th St. | 57.2 | 58.6 | 1.4 | No |
| S/B Ardmore Ave., from 6th St. | 56.6 | 58.4 | 1.8 | No |
| N/B Irolo St., from 7th St. | 66.4 | 66.5 | 0.1 | No |
| S/B Irolo St., to 7th St. | 67.3 | 67.4 | 0.1 | No |

*Source: DKA Planning, 2016.*

**Vibration Definitions**

Peak particle velocity (PPV) is defined as the maximum instantaneous peak of a vibration signal; it is usually measured in inches per second. PPV can be used to describe vibration impacts to buildings and humans.[69]

Root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on land uses. RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation

[69] *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

(VdB) is commonly used to measure RMS. Decibel notation acts to compress the range of numbers required to describe vibration.[70]

**Effects of Vibration**

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

**Perceptible Vibration Changes**

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration velocity levels in residential areas are usually well below the threshold of perception for humans, which is around 0.01 inches per second.[71] Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough roads. Traffic vibration is typically not perceptible on smooth, well-maintained roads.

**Applicable Regulations**

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relating to structural vibration impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[72]

Additionally, the Federal Transit Administration (FTA) has established guidelines that provide significance thresholds for ground-borne vibration disrupting various land uses. For institutional land uses such as schools, churches, and offices experiencing occasional events of ground-borne vibration or

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[70] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[71] *Ibid.*

[72] *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

noise from transient sources, the FTA has established a threshold of 78 VdB.[73] For recording and TV studio land uses, the threshold is 65 VdB for all events.[74]

In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to ground-borne 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 ground-borne 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, Caltrans' adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to Project construction. Table IV-27 identifies Caltrans' building damage significance thresholds.

**Table IV-27**
**Building Damage Vibration Thresholds (PPV)**

| Structure and Condition | Significance Thresholds (in/sec PPV) | |
|---|---|---|
| | Transient Sources | Continuous/Frequent/ Intermittent Sources |
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |
| *Source: California Department of Transportation, 2013.* | | |

The City has also not adopted any thresholds associated with land-use disruption caused by ground-borne vibration. Therefore, this analysis uses the FTA's vibration impact thresholds for land use disruption. Table IV-28 identifies these thresholds.

[73] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[74] *Ibid.*

**Table IV-28**
**Land Use Disruption Vibration Thresholds (VdB)**

| Land Use | Significance Thresholds (VdB) | | |
|---|---|---|---|
| | Frequent Events | Occasional Events | Infrequent Events |
| Buildings where vibration would interfere with interior operations. | 65 | 65 | 65 |
| Residences and buildings where people normally sleep. | 72 | 75 | 80 |
| Institutional land uses with primarily daytime use | 75 | 78 | 83 |
| Concert halls, TV studios, and recording studios | 65 | 65 | 65 |
| Auditoriums and theaters | 72 | 80 | 80 |
| *Source: Federal Transit Administration, 2006* | | | |

**Project Vibration Impacts**

Groundborne vibration would be generated by a number of construction activities. Vibration velocities estimated to occur at the nearest off-site sensitive receptor could produce up to a 0.041 inches per second PPV at Lily School as a result of drilling/boring activities. This is far below the 0.5 inches per second PPV threshold that is considered potentially harmful to modern industrial/commercial buildings. As shown on Table IV-29, more distant receptors would experience even lower ground velocities. Other potential construction activities would produce even less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be less than significant.

**Table IV-29**
**Building Damage Vibration Levels at Off-Site Structures**

| Off-Site Structures | Distance to Project Site (ft.) | Estimated PPV (in/sec) | Structural Significance Threshold (in/sec) | Significant? |
|---|---|---|---|---|
| Ardmore Riviera Apartments | 90 | 0.017 | 0.3 | No |
| Azusa Pacific and Bryan College | 150 | 0.009 | 0.5 | No |
| St. Basil Church Rectory | 260 | 0.004 | 0.5 | No |
| Lily School | 45 | 0.041 | 0.5 | No |
| *Source: DKA Planning 2016.* | | | | |

In terms of land-use disruption, the maximum vibration level experienced at off-site sensitive receptors would be 79.3 VdB at Lily School, as shown in Table IV-30. Though this 79.3 VdB level would exceed the FTA's institutional land use thresholds for frequent and occasional events, the drilling/boring

activities capable of generating this level of groundborne vibration would not occur more than 30 times per day, and would therefore not be judged against stricter thresholds for more frequent events. Additionally, not all drilling/boring activities would occur at the minimum Project-to-receptor distance used for this analysis. Rather, most would occur beyond this conservative estimate.

**Table IV-30**
**Land Use Interference Vibration Levels**

| Off-Site Receptor – Land Use | Distance to Project Site (ft.) | Estimated VdB | Land-Use Interference Threshold (VdB) | Significant? |
|---|---|---|---|---|
| Ardmore Riviera Apartments | 90 | 70.3 | 80 | No |
| Azusa Pacific and Bryan College | 150 | 63.7 | 83 | No |
| St. Basil Church Rectory | 260 | 56.5 | 80 | No |
| Lily School | 45 | 79.3 | 83 | No |
| *Source: DKA Planning 2016.* | | | | |

Other more distant receptors would experience even less construction-related vibration than Lily School. As a result, construction-related vibration impacts on nearby land uses would be less than significant.

The Project could also generate vibration from the hauling of demolition and cut materials from the Project site. This could increase vibration along haul route roadways, though any annoyance to residents along these routes would be temporary and minor, especially given the Project's peak deployment of only 2-3 haul trucks per hour. As a result, haul truck vibration impacts would be less than significant.

Structural and land-use vibration impacts were not analyzed for Riverdale Avenue Residences. Given its 600-foot distance from the Project site, that receptor would not experience any Project-related ground-borne vibration. Additionally, the paved channel of the Los Angeles River lies between Riverdale Avenue Residences and the Project site. Similar to how barriers attenuate noise by obstructing its line-of-sight travel, trenches obstruct direct source-to-receptor ground-borne vibration paths. At Riverdale Avenue Residences, Project-generated ground-borne vibration would have no impact.

The Project could also generate vibration from the hauling of treated soils to regional landfills. This could increase vibration levels at receptors along haul route roadways. However, any annoyance to residents along these routes would be temporary and minor, especially given the Project's peak average deployment of just 11.1 trucks per hour. Additionally, Project haul routes would not travel along roadways with numerous roadside receptors, especially residential ones. As a result, haul truck vibration impacts would be less than significant.

**c) Would the project result in a substantial permanent increase in ambient noise levels in the Project site vicinity above levels existing without the project?**

**Less Than Significant Impact**. As discussed in response to Checklist Question 12a, the Project would not generate a substantial permanent increase in noise in excess of City noise standards. Therefore, Project impacts related to permanent noise increase would be less than significant.

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

**Less Than Significant With Mitigation Incorporated**. As discussed in response to Checklist Question 12a, with mitigation, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in excess of City noise standards. Therefore, Project impacts related to temporary or periodic noise increase would be less than significant.

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

**No Impact**. The Project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

**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**. The Project site is not located in the vicinity of a private airstrip. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

**Mitigation Measures (Noise)**

To reduce the Project's construction impacts to the maximum extent feasible, the following mitigation measures are required (refer to Table IV-31):

**Table IV-31**
**Construction Noise Levels – Mitigated**

| Sensitive Receptor | Distance from Site (feet) | Maximum Construction Noise Level (dBA) | Existing Ambient (dBA, $L_{eq}$) | New Ambient (dBA, $L_{eq}$) | Increase |
|---|---|---|---|---|---|
| Ardmore Riviera Apartments | 90 | 64.3 | 62.8 | 66.6 | 3.8 |

| | | | | | |
|---|---|---|---|---|---|
| Azusa Pacific and Bryan College | 150 | 73.7 | 73.4 | 76.6 | 3.2 |
| St. Basil Church Rectory | 260 | 52.2 | 63.1 | 63.4 | 0.3 |
| Lily School | 5 | 66.7 | 63.5 | 68.4 | 4.9 |
| *Source: DKA Planning, 2016.* | | | | | |

12-1 Temporary sound barriers capable of blocking line-of-sight to adjacent land-uses shall be installed as specified:

- A temporary noise barrier no less than 8 feet in height shall be erected to block line-of-sight noise travel from the Project site to Ardmore Riviera and neighboring apartments. This barrier should extend along the eastern edge of the Project site to prevent construction noise from diffracting around its ends.

- A temporary noise barrier no less than 10 feet in height shall be erected to block line-of-sight noise travel from the Project site to Lily School. This barrier should be constructed in such a way so as to have a surface weight of four pounds per square foot or greater. The Project-facing side should be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier should also extend along the western edge of the Project site to prevent construction noise from diffracting around its ends.

- At all other Project boundaries, temporary noise barriers no less than 8 feet in height shall be erected to prevent Project construction operations from exceeding LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.

12-2 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.

12-3 All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.

12-4 Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.

# 13. POPULATION AND HOUSING

**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.**

**Regulatory Framework**

***Regional***

*Southern California Association of Governments*

SCAG is the federally designated metropolitan planning organization for six Southern California counties including the County of Los Angeles. SCAG prepared, and adopted, the 1996 Regional Comprehensive Plan and Guide (RCPG), the 5th Cycle for 2014-2021 Regional Housing Needs Assessment (2014-2021 RHNA) (approved November 26, 2012), the 2008 Regional Transportation Plan (RTP), and the Regional Transportation Improvement Program (RTIP) to address regional growth and measure progress toward achieving regional planning goals and objectives. SCAG has released its 2008 Regional Comprehensive Plan (RCP), as an update to the adopted 1996 RCPG. In April 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Community Strategy (2016-2040 RTP/SCS) based, in part, on data from the 2010 U.S. Census.

2008 Regional Comprehensive Plan

SCAG prepared and issued the 2008 RCP in response to the SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.

The 2008 RCP serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life. The 2008 RCP incorporates principles and goals of the 2004 Compass Blueprint Growth Vision, as discussed below. The 2008 RCP includes nine chapter areas: Land Use and Housing, Transportation, Air Quality, Energy, Open Space and Habitat, Water, Solid Waste, Economy, and Security and Emergency Preparedness. Each chapter is organized into three sections: goals, outcomes, and action plans.

The RCP chapters that are relevant to population and housing are the Growth Management and Housing Chapters. The purpose of the Growth Management Chapter is to present forecasts which establish the socioeconomic context for the RCPG, particularly the Regional Mobility and Air Quality Chapters. It also addresses issues related to growth and land consumption by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region.

The Housing Chapter includes advisory strategies for bringing housing costs and decent shelter within reach of more households in order to support the economic health and social vitality of the region. Its goals include providing for decent and affordable housing for all people; an adequate supply and availability of housing; housing stock maintenance and preservation; and promoting a mix of housing opportunities region wide.

Regional Housing Needs Assessment

The RHNA is a key tool for SCAG and its member governments to plan for growth. The 2014-2021 RHNA quantifies the need for housing within each jurisdiction between 2014 and 2021. Communities then plan, consider, and decide how they will address this need through the process of completing the housing elements of their general plans. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, and improve access to jobs, transportation and housing, without adversely impacting the environment. The RHNA is produced periodically by SCAG, as mandated by State law, to coincide with the region's schedule for preparing housing elements. It consists of two measurements of housing need: (a) existing need; and (b) future need.

The existing need assessment is based on data from the most recent U.S. Census to measure ways in which the housing market is not meeting the needs of current residents. These variables include the number of low-income households paying more than 30 percent of their income for housing, as well as severe overcrowding.

The future need for housing is determined primarily by the forecasted growth in households in a community, based on historical growth patterns, job creation, household formation rates, and other factors to estimate how many households will be added to each community over the projection period. The housing need for new households is then adjusted to account for an ideal level of vacancy needed to promote housing choice, maintain price competition and encourage acceptable levels of housing upkeep and repair. The RHNA also accounts for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors - household growth, vacancy need and replacement need - form the "construction need" assigned to each community. The City of Los Angeles was assigned a RHNA of 82,002 units for the 2014-2021 planning period.[75] There is no process for allocating the citywide total to City subareas, such as a Community Plan Area. Finally, the RHNA considers how each jurisdiction might grow in ways that will decrease the concentration of low-income households in certain communities. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution.

[75] *City of Los Angeles General Plan Housing Element, Housing Needs Assessment, December 3, 2013.*

2016-2040 RTP/SCS

The 2016-2040 RTP/SCS includes a proposed growth forecast for population, household, and employment for the City of Los Angeles in 2020 and 2035:[76]

- Population: 3,845,500 persons in 2012 and 4,609,400 in 2040;
- Households: 1,325,500 households in 2012 and 1,690,300 in 2040; and
- Employment: 1,696,400 jobs in 2020 and 2,169,100 in 2035.

***City***

*City of Los Angeles General Plan*

The General Plan addresses community development goals and policies relative to the distribution of land use, both public and private, including housing. The General Plan integrates citywide elements, Community Plans, and Specific Plans and gives policy direction for planning regulations and implementation programs.

General Plan Framework Element

The General Plan Framework Element (General Plan Framework or Framework Element), adopted in December 1996 (re-adopted August 2001), is a strategy for long-term growth that sets a citywide context to guide the update of the Community Plans and citywide elements. The Framework Element provides that precise determinations regarding future growth and development will be made through the Community Planning process. The Framework Element encourages future growth and development within target areas, but does not require that future development and growth be limited to target areas. The Framework Element's central housing goal is an equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

The General Plan Framework focuses on providing strategies for accommodating growth by encouraging growth in a number of higher-intensity commercial and mixed-use districts, centers, boulevards and industrial districts particularly in proximity to transportation corridors and transit stations. It is intended to be flexible and provides a Long Range Land Use Diagram recommending the creation of new land use categories for targeted growth areas in various areas of the City that will contain international centers,

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[76] *SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24: http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf.*

regional centers, community centers, neighborhood districts, and mixed-use boulevards based on the planning principles, goals, objectives, and policies it discusses.

General Plan Housing Element

The Housing Element of the City's General Plan identifies as its overall goal the creation of a city of livable and sustainable neighborhoods with a range of housing types and costs in mutual proximity to jobs, infrastructure and services.

On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan for the period of 2013-2021. The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period and is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans, or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.

An objective of the Housing Element is to promote an equitable distribution of affordable housing opportunities throughout the City by providing incentives to include affordable housing in residential development, particularly in mixed-use developments. The Project would further the goals and objectives of the Housing Element by providing additional housing stock.

**Existing and Forecasted Population and Housing for City of Los Angeles**

According to analysis by the State's Housing and Community Development Department, prior to the recent economic downturn and foreclosure crisis, California had experienced decades of undersupply of housing, contributing to significant price escalation and the affordability crisis. The factors contributing to California's continuing housing supply and affordability problems include a chronic mismatch between the existing housing stock and the demand for housing by type and location; lack of sufficient housing construction to meet demand; and persistently high housing costs relative to household incomes, even with the effects of the recent national recession.

Almost all future California population and household growth will occur in metropolitan areas, and most of that will occur in southern California. According to SCAG's 2008 growth forecast, the six-county region is projected to add about 4.6 million people and about 1.6 million households between 2010 and 2035. In Los Angeles County alone, the forecast envisions about 1.7 million people and about 646,000 households between 2010 and 2035. As the largest city in the County, the City of Los Angeles will receive most of the County's future growth.

SCAG's State-approved 2007 RHNA assigns 82,002 units of housing production need to the City of Los Angeles for the 2008-2014 Housing Element (which actually covers a 7.5-year planning period), or an annual average of about 15,000 new dwelling units per year.

The Housing Element of the City's General Plan, mentioned above, notes that for over 10 years, the City has been pursuing a sustainable approach to accommodating long-range growth. This approach is established in the Framework Element of the General Plan, first adopted in 1995, which encourages sustainable growth in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit. The goals and policies of the Framework Element establish a balanced approach to growth by linking it to the land uses and infrastructure that will support the type of infill development that incurs the least economic, environmental, and social costs.

Table IV-32 lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2020 and 2035, as well as the number and percent change.

**Existing Project Site Conditions**

The Project site is currently developed with commercial buildings and surface parking. No residential population is housed at the Project site

**Project Impacts**

The Project includes demolition and removal of the existing structures and parking areas at the Project site and development of the site with approximately 513,732 square feet of multi-family residential dwelling units (428 units), retail land uses (32,689 square feet), and parking land uses. Based on the 2015 persons-per-household rate for the City shown on Table IV-29, the Project would generate approximately 1,173 residents at the Project site.

As shown on Table IV-33, the Project would represent a negligible percent of the estimated population and housing growth in the City. The Project's residents and housing units would be within the estimates and RHNA allocation. Additionally, the Project would help achieve a portion of the household growth forecast for the City and the Wilshire Community Plan Area, while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. Thus, the Project housing and residential population would not represent a substantial or significant growth as compared to projected growth. Therefore, Project impacts related to population and housing would be less than significant.

**Table IV-32**
**Population and Households in the City of Los Angeles**

| Year | Population | Households | Person/Households |
|---|---|---|---|
| 2010 | 3,792,621 | 1,412,006 | 2.69 |
| 2015 | 3,957,022 | 1,440,779 | 2.74 |

| | | | |
|---|---|---|---|
| 2020 | 3,991,700 | 1,455,700 | 2.74 |
| 2035 | 4,320,600 | 1,626,600 | 2.66 |
| ***Change 2010 to 2015*** | | | |
| Number Changed | +164,401 | +28,773 | +0.05 |
| Percent Changed | +4.3% | +2.0% | +1.8% |
| ***Change 2015 to 2020*** | | | |
| Number Changed | +34,678 | +14,921 | 0.0 |
| Percent Changed | +0.8% | +1.0% | 0% |
| ***Change 2015 to 2035*** | | | |
| Number Changed | +363,578 | +185,821 | -0.08 |
| Percent Changed | +9.1% | +12.8% | -2.9% |

*2010: Census data, reported 4/1/2010.*
*2015: As of January 1, 2015, Department of Finance: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php. 2016 information was not yet available when this IS/MND was prepared.*
*2020 and 2035: Based on the adopted 2012-2035 Regional Transportation Plan by SCAG, page 32: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf.*

**Table IV-33**
**Project Estimated Comparison**

| Project | Comparison Amount[1] | % of Comparison |
|---|---|---|
| **As compared to Growth Forecast from 2015 to 2020** | | |
| 1,173 residents | +34,678 | 3.38 |
| 428 units | +14,921 | 2.86 |
| **As compared to Growth Forecast from 2015 to 2035** | | |
| 1,173 residents | +363,578 | 0.32 |
| 428 units | +185,821 | 0.23 |
| **As compared to City's 2013-2021 Housing Element** | | |
| 428 units | 51,490 (Wilshire Community Plan)[2] | 0.83 |
| 428 units | 82,002 (Citywide)[3] | 0.52 |

1 *Refer to Table IV-29.*
2 *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.*
3 *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.*

**b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** No housing is located on the Project site. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

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

**No Impact.** No housing or residential population is located on the Project site. As such, the Project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

# 14. PUBLIC SERVICES

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:**

**(i) Fire protection?**

**Less Than Significant Impact.** The Project includes demolition and removal of the existing commercial structures and parking areas at the Project site and development of the site with approximately 428 square multi-family residential dwelling units and 31,689 square feet of commercial space, increasing the need for fire protection services at the Project site. Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.09.07, the maximum response distance between a high-density residential/commercial neighborhood land use and a LAFD station that houses an engine or truck company is 1.5 miles. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems.[77]

The Project site is served by several fire stations, as shown on Table IV-34. As shown, the Project site is located approximately 0.8 mile from Fire Station 29 Since the Project site is located within the distance identified by LAMC Section 57.09.07, the Project need not be constructed with automatic fire sprinkler

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[77] *LAFD website: http://lafd.org/prevention/hydrants/division_9_fc.html, accessed October 22, 2014.*

systems and any additional fire protection as required by the LAFD Chief, unless other building and safety codes supersede this.

**Table VI-34**
**Fire Stations Serving the Project Site**

| No. | Address | Distance from Project Site |
|---|---|---|
| 6 | 326 North Virgil Avenue | 1.9 |
| 11 | 1819 West 7th Street | 1.9 |
| 13 | 2401 West Pico Boulevard | 1.7 |
| 26 | 2009 South Western Avenue | 3.0 |
| 29 | 4029 West Wilshire Boulevard | 0.8 |
| *Source: http://www.lafd.org/fire-stations/find-your-station* | | |

All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access. Approximate fire-flow requirement for the Project is 4,000 gallons per minute with a 20 pounds-per-inch residual pressure. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process. Through compliance with these requirements, Project impacts related to fire protection services would be less than significant.

**(ii) Police protection?**

**Less Than Significant Impact.** The Project includes demolition and removal of the existing commercial structures and parking areas at the Project site and development of the site with approximately 428 square multi-family residential dwelling units and 31,689 square feet of commercial space, increasing the need for police protection services at the Project site, increasing the need for police protection services at the Project site. However, in accordance with the City's Standard Condition of Approval, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits by the Department of Building and Safety. Through compliance with the requirements of the LAPD, Project impacts related to police protection services would be less than significant.

**(iii) Schools?**

**Less Than Significant Impact.** Los Angeles Unified School District's (LAUSD) schools that serve the Project site and area are shown on Table IV-35. As shown on Table IV-36, the Project would generate a total of approximately 112 students, including 54 elementary students, 30 middle school students, and 28

high school students. Based on the remaining capacity shown on Table IV-35, the schools serving the Project site would have adequate capacity to serve the Project's student generation. In addition, pursuant to the California Government Code, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

**Table IV-35**
**LAUSD School's Serving the Project Area Student Capacity and Enrollment**

| School Type (Grade) | School Name | Capacity (students) | Actual Enrollment (students) | (-)Under / (+)Over Capacity (students) |
|---|---|---|---|---|
| **School Choice Area Totals Robert F. Kennedy Zone of Choice** | | | | |
| K-5 | Ambassador School of Global Education | 432 | 405 | +27 |
| K-12 | Ambassador School of Global Leadership | 845 | 660 | +185 |
| K-12 | UCLA Community School | 1,124 | 1,011 | +113 |
| K-12 | New Open World Academy | 1,206 | 1,154 | +52 |
| 9-12 | School of Visual Arts and Humanities | 588 | 457 | +131 |
| 9-12 | Los Angeles School of Arts | 461 | 413 | +48 |

*Source: LAUSD, Rena Perez, Director, January 21, 2016 (refer to Appendix J).*

**Table IV-36**
**Estimated Project Student Generation**

| Use Type | Amount of Development | School Type | Student Generation Factor [a] | Total Students Generated |
|---|---|---|---|---|
| Residential | 428 du | Elementary School (K-5) | 0.1266/du | 54 |
| | | Middle School (6-8) | 0.0692/du | 30 |
| | | High School (9-12) | 0.0659/du | 28 |
| | | | **Total** | **112** |

*du = dwelling unit* *Number of students has been rounded to the nearest whole number.*

[a] *Los Angeles Unified School District, Student Generation Rate Calculation, February 25, 2008.*

**(iv) Parks?**

**Less Than Significant Impact.** As shown on Table IV-37, based on LAMC open space standards, the Project would be required to include a minimum of 52,000 square feet of open space. The Project includes balconies, courtyards, green space between buildings, community rooms, gym, pool, Jacuzzi, seating areas, cabanas, art installations, barbeques, and fire pits, and recreation room, meeting the LAMC standard.

**Table IV-37**
**Open Space Required of and Provided by the Project**

| LAMC Open Space Requirement | Project Units | Total Open Space Required |
|---|---|---|
| <3 habitable rooms = 100 sf/du | 132 du | 13,200 sf |
| =3 habitable rooms = 125sf/du | 260 du | 32,500 sf |
| >3 habitable rooms = 175 sf/du | 36 du | 6,300 sf |
| | *Total Required* | *52,000 sf* |
| | **Total Provided** | **52,000 sf** |
| *sf = square feet* *du = dwelling unit* | | |

The Project would consist of 428 residential dwelling units, which would add an estimated 1,173 residents at the Project site. The standard minimum parkland-to-population ratio, provided in the City's General Plan Framework Element, is two acres of parkland per 1,000 residents generated. Therefore, implementation of the Project would require approximately 0.856 acre of parkland.[78] However, the Project Applicant shall pay all required parkland fees pursuant to the LAMC, including, in consultation with the City of Los Angeles Department of Recreation and Parks, the Project Applicant shall be required to comply with one or more of the following: 1) dedicate two acres of parkland per 1,000 residents, 2) pay in-lieu fees for any land dedication requirement shortfall, or 3) provide on-site improvements equivalent in value of the in-lieu fees, or any portion thereof. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

**(v) Other public facilities?**

**Libraries**

**Less Than Significant Impact.** Several libraries are located in the Project area, including: Pio Pico Library, Pico Union Branch Library, Felipe De Neve Branch Library, Memorial Branch Library, and the John C. Fremont Branch Library. The Project would add an estimated 1,173 residents at the Project site,

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[78] *[(428 residents) ÷ (1,000)] = 0.428 thousand residents. [(2 acres of parkland) x (0.0.428 thousand residents)] = 0.856 required acre.*

likely increasing the demand for library services in the Project area. However, the Project area is well served by several libraries, and the Project's residential population would not create the need for new or expanded library facilities. Therefore, Project impacts related to libraries would be less than significant.

# 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?**

**Less Than Significant Impact.** As discussed above in response to Checklist Question 14iv (Parks), the amount of open space included as part of the Project would exceed the City's requirements for open space. Also, the Project Applicant would be required to either dedicated approximately 0.856 acre of parkland, pay in-lieu fees, or provide on-site improvements equivalent in value to in-lieu fees (or any portion thereof). The Project would not cause substantial deterioration of parks and recreational facilities. Therefore, impacts related to this issue would be less than significant.

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

**Less Than Significant Impact.** The Project includes development of a courtyards, swimming pool, roof terrace, and gym that is inclusive of the proposed residential development and is required to meet the City's open space requirements. The assessment of impacts associated with development of these open space facilities is inclusive of the assessment of impacts associated with the Project in its entirety. No direct significant impacts would occur as a result of development of the open space facilities.

# 16. TRANSPORTATION AND TRAFFIC

**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?**

**Less Than Significant Impact.** The analysis in this section is based on the Traffic Study for the 3545 Wilshire Boulevard Project (the "Traffic Study") and the Updated Traffic Impact Evaluation, both prepared by RAJU Associates, Inc. (refer to Appendix K), and Traffic Impact Assessments conducted by LADOT (refer to Appendix K).

**Study Area**

Detailed traffic analysis of existing conditions were performed at the following eight study intersections:

1. Western Avenue and Wilshire Boulevard
2. Harvard Boulevard and 6th Street
3. Harvard Boulevard and Wilshire Boulevard
4. Ardmore Avenue and 6th Street
5. Ardmore Avenue and Wilshire Boulevard
6. Normandie Avenue and 6th Street
7. Normandie Avenue-Irolo Street and Wilshire Boulevard
8. Irolo Street and 7th Street

These study intersections were determined in consultation with the Los Angeles Department of Transportation (LADOT) (refer to Figure IV-5). The study intersections are the locations expected to experience the large majority of Project trips and therefore, where potential Project impacts could occur. All of the study intersections are signalized and operate with LADOT's Adaptive Traffic Control System (ATCS), an upgrade of the Automated Traffic Surveillance and Control System (ATSAC). LADOT estimates that ATSAC/ATCS improves the overall intersection capacity by an average of 10 percent.

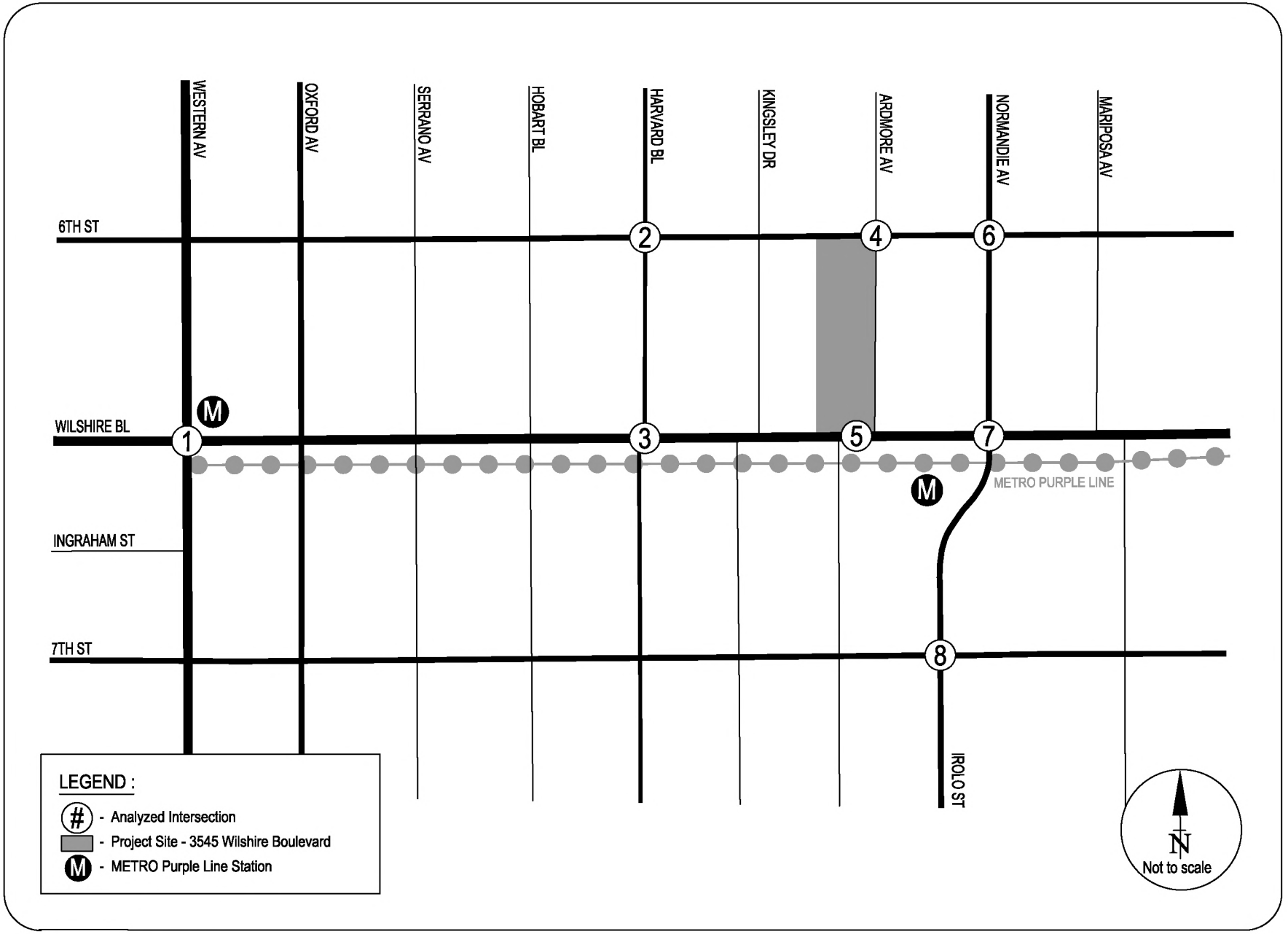
**Existing Street System**

The existing street system within the study area consists of a regional highway system including major and secondary arterials and a local street system including collectors and local streets. A description of the regional and local access and circulation offered by the various roadways is provided below.

The US 101, SR 110 and I-10 provide regional access, connectivity and circulation opportunities. The major and other arterial streets used to access the study area include Wilshire Boulevard, Western Avenue, Normandie Avenue, Irolo Street, 6th Street, 7th Street and Harvard Boulevard. Ardmore Avenue provides local access and circulation. Brief descriptions of these facilities serving the study area are included below.

- Wilshire Boulevard – Wilshire Boulevard is classified as a major arterial roadway and defines the southern frontage of the Project site. It runs in an east-west direction. During commuter peak hours, the roadway generally offers six travel lanes, three lanes in each direction. Currently, the curb lanes between Western Avenue and South Park View Street are designated as bus-only lanes during peak commute hours. During the off-peak hours, this facility provides two lanes in each direction. Restricted metered parking is available during the off-peak hours along many stretches of this roadway within the study area. The posted speed limit is 35 miles per hour.

- Western Avenue – Western Avenue is classified as a major arterial roadway that runs in a north-south direction. The roadway generally offers four travel lanes, two lanes in each direction. Within the study area, metered parking is available along both sides of the street. The posted speed limit is 35 miles per hour.




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-5
Location of Project and Analyzed Intersections

- Normandie Avenue – Normandie Avenue is classified as a secondary arterial roadway and runs in a north-south direction. South of Wilshire Boulevard, Normandie Avenue becomes Irolo Street. During commuter peak hours, the roadway generally offers three travel lanes, one lane in the northbound direction and two lanes in the southbound direction in the morning and two lanes in the northbound direction and one lane in the south direction in the evening. During the off-peak hours, this facility provides one lane in each direction. Restricted parking is generally available on both sides of the street. The posted speed limit along this facility is 30 miles per hour.

- Irolo Street – Irolo Street is classified as a secondary arterial roadway and it runs in a north-south direction. This street is a continuation of Normandie Avenue at Wilshire Boulevard and ends at San Marino Street where it reverts back to Normandie Avenue. Between Wilshire Boulevard and 7th Street, this roadway provides four travel lanes, two lanes in each direction, during commuter peak hours. South of 7th Street, it provides one lane in each direction with restricted parking generally available on both sides of the street. The posted speed limit along this facility is 30 miles per hour.

- 6th Street – 6th Street is classified as a secondary arterial roadway that runs in an east-west direction and defines the northern frontage of the Project site. This roadway provides four travel lanes during peak commute hours, two lanes in each direction with a double-yellow line median. Restricted metered parking is available on either side of the street within the study area. The posted speed limit is 35 miles per hour.

- 7th Street – 7th Street is classified as a secondary arterial roadway and traverses in an east-west direction. Within the study area, this roadway provides two travel lanes, one lane in each direction. Parking is available on either side of the street with sections of restricted metered parking on the north side of the street. The prima facie speed limit is 25 miles per hour.

- Harvard Boulevard – Harvard Boulevard is classified as a collector roadway and runs in a north-south direction. This roadway generally offers two travel lanes, one lane in each direction. Within the study area, restricted metered parking is generally available on either side of the street. The prima facie speed limit is 25 miles per hour.

- Ardmore Avenue – Ardmore Avenue is a local roadway that runs in a north-south direction and defines the eastern frontage of the Project site. This roadway provides two travel lanes, one lane in each direction. Parking is generally available on either side of the street. Within the study area, metered parking is available on the west side of Ardmore Avenue (between 6th Street and Wilshire Boulevard) with both metered and non-metered parking on the east side. The prima facie speed limit is 25 miles per hour along this roadway. Ardmore Avenue connects at two skewed T-intersections with Wilshire Boulevard approximately 80 feet apart.

**Existing Traffic Volumes**

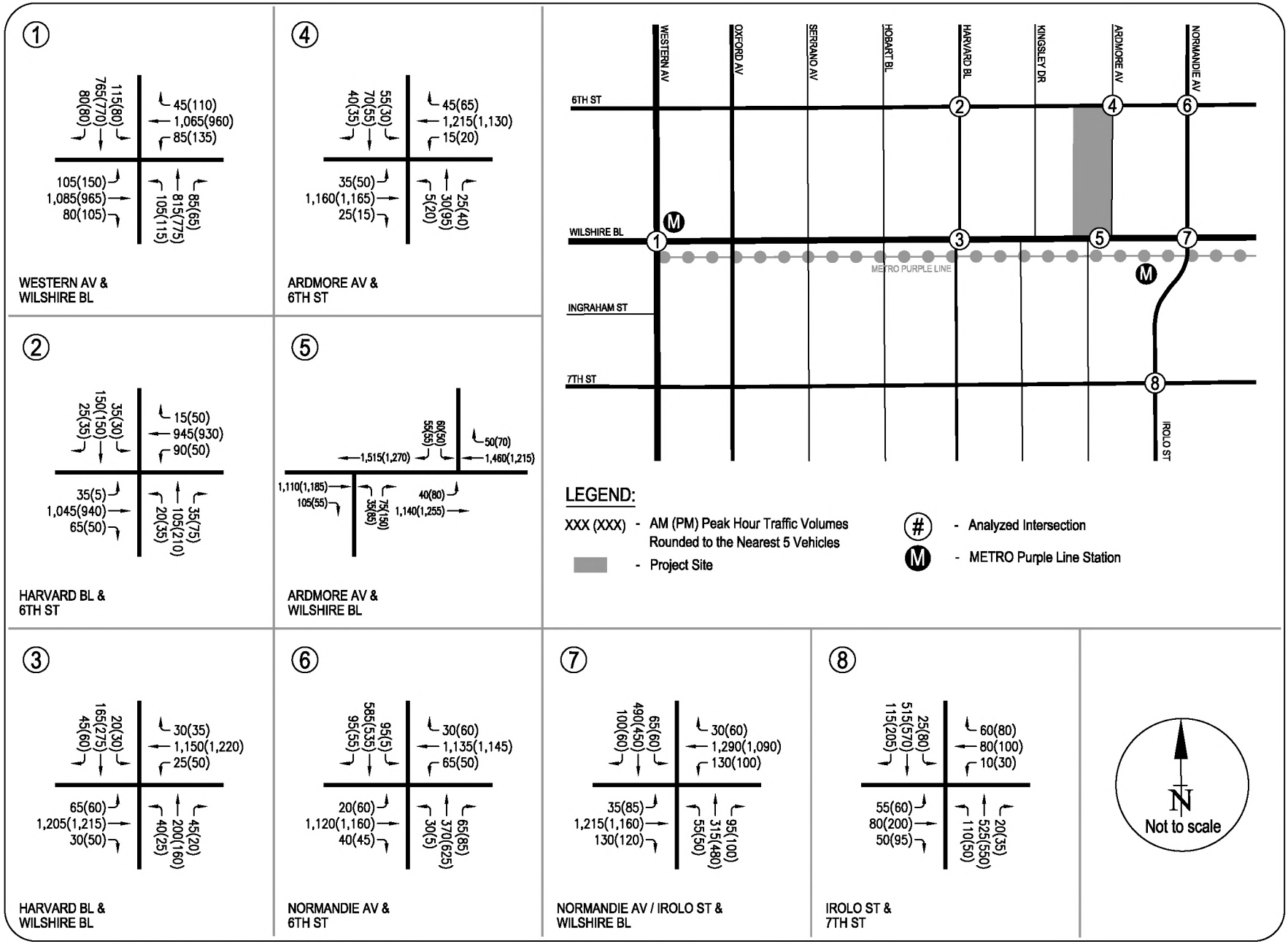
Weekday morning and evening peak-hour traffic counts were compiled from data collected at two of the eight analyzed intersections in January 2015. Traffic count data at two intersections was collected in September 2014 and traffic count data for the remaining four intersections was collected in March and October 2013. The counts collected in years 2013 and 2014 were adjusted upwards by 1.0 percent per year to represent Existing 2015 conditions. These traffic volumes reflect typical weekday operations during current year 2015 conditions. The traffic volumes on Figure IV-6 represent, for the purposes of this analysis, the Existing 2015 AM and PM peak hour conditions.

**Analysis Methodology**

The methodology used in the Traffic Study for the analysis and evaluation of each study intersection is based on procedures outlined in *Circular Number 212*, published in 1980 by the Transportation Research Board. In the discussion of Critical Movement Analysis for signalized intersections, procedures have been developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of critical signal phases and traffic lanes.

LOS describes the quality of traffic flow, ranging from excellent conditions at LOS A to failure conditions at LOS F. LOS D is recognized by many cities as an acceptable service level in urban areas. LOS E is recognized by some cities as an acceptable standard in downtown areas, major commercial areas, and at freeway ramp intersections.

Determination of the LOS at an intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes at that intersection. Once the critical movement volumes have been summed, the values indicated on Table IV-38 can be used to determine the applicable LOS.




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-6
Existing (2015) Conditions
Peak Hour Traffic Volumes

**Table IV-38**
**CMA Volume Ranges per LOS***

| LOS | Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases | | |
|---|---|---|---|
| | Two Phases | Three Phases | For or More Phases |
| A | 900 | 855 | 825 |
| B | 1,050 | 1,000 | 965 |
| C | 1,200 | 1,140 | 1,100 |
| D | 1,350 | 1,275 | 1,225 |
| E | 1,500 | 1,425 | 1,375 |
| F | NA | NA | NA |
| * *For planning applications only. Not appropriate for operations/design applications.* | | | |

"Capacity" represents the maximum total hourly volume of vehicles (i.e., vehicles per hour [VPH]), in the critical lanes that is reasonably expected to proceed through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of LOS E, as indicated on Table IV-38. The volume-to-capacity (V/C) ratios used in this study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the study intersections. Table IV-39 presents the LOS corresponding to a range of V/C ratios.

**Table IV-39**
**LOS Definitions for Signalized Intersections (CMA Method)**

| LOS | Intersection Capacity Utilization | Definition |
|---|---|---|
| A | 0.000 - 0.600 | EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used. |
| B | 0.601 - 0.700 | VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles. |
| C | 0.701 - 0.800 | GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles. |
| D | 0.801 - 0.900 | FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups. |
| E | 0.901 - 1.000 | POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles. |
| F | > 1.000 | FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths. |

**Table IV-39**
**LOS Definitions for Signalized Intersections (CMA Method)**

| LOS | Intersection Capacity Utilization | Definition |
|---|---|---|
| *Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.* | | |

All of the study intersections are currently controlled by the City's Mid-Wilshire Automated Traffic Surveillance and Control (ATSAC) System and Adaptive Traffic Control System (ATCS). In accordance with LADOT procedures, a capacity increase of 10 percent (0.07 V/C adjustment for ATSAC and 0.03 V/C adjustment for ATCS) was applied to reflect the benefits of ATSAC/ATCS control at these intersections.

**Existing LOS**

The existing traffic volumes presented on Figure IV-6 for AM and PM peak hours were used in conjunction with the LOS methodologies described above and the current intersection characteristics to determine the existing operating conditions at the analyzed intersections. Table IV-40 summarizes the results of the intersection capacity analysis for existing conditions at each of the eight intersections in the study area. The table indicates the existing V/C ratio during the morning and evening peak hours and the corresponding LOS at the study intersections. As illustrated on the table, all eight of the study intersections are currently operating at LOS C or better during both the morning and evening peak hours.

**Existing Transit Conditions**

Thirteen bus lines as well as the Metro Rail Purple Line currently serve the study area. Nine bus lines, including three Rapid Bus lines, are operated by the Los Angeles County Metropolitan Transportation Authority (LACMTA) or Metro, two bus lines are operated by the LADOT, one bus line is operated by the City of Santa Monica Big Blue Bus (BBB) and one bus line is operated by Foothill Transit (FT). In addition to these bus lines, the Metro Rail Purple Line's Wilshire/Normandie Station is located within one block from the Project site. These transit lines are described below.

- LACMTA 18 - Line 18 is a local east/west line that provides service from Wilshire Center to Montebello and travels primarily along Wilshire Boulevard and 6th Street within the study area. This line runs every day, including holidays, at a peak frequency of approximately 8-10 minutes. The western terminus is at the Metro Wilshire/Western Station in Koreatown. The eastern terminus is at the Metrolink Station in Montebello.

**Table IV-40**
**Summary of LOS Conditions**

| No. | Intersection | Peak Hour | Existing (2015) Conditions | | Existing (2015) Plus Project Conditions | | Project Increase in V/C | Significant Project Impact | Cumulative (2018) Base Conditions | | Cumulative (2018) Plus Project Conditions | | Project Increase in V/C | Significant Project Impact |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS | | | V/C | LOS | V/C | LOS | | |
| 1. | Western Avenue & Wilshire Boulevard [a] | AM | 0.773 | C | 0.776 | C | 0.003 | No | 0.916 | E | 0.920 | E | 0.004 | No |
| | | PM | 0.749 | C | 0.749 | C | 0.000 | No | 0.901 | E | 0.907 | E | 0.006 | No |
| 2. | Harvard Boulevard & 6th Street | AM | 0.483 | A | 0.481 | A | -0.002 | No | 0.569 | A | 0.567 | A | -0.002 | No |
| | | PM | 0.495 | A | 0.516 | A | 0.021 | No | 0.593 | A | 0.614 | B | 0.021 | No |
| 3. | Harvard Boulevard & Wilshire Boulevard | AM | 0.529 | A | 0.535 | A | 0.006 | No | 0.692 | B | 0.699 | B | 0.007 | No |
| | | PM | 0.609 | B | 0.610 | B | 0.001 | No | 0.768 | C | 0.773 | C | 0.005 | No |
| 4. | Ardmore Avenue & 6th Street | AM | 0.455 | A | 0.470 | A | 0.015 | No | 0.505 | A | 0.519 | A | 0.014 | No |
| | | PM | 0.459 | A | 0.477 | A | 0.018 | No | 0.504 | A | 0.529 | A | 0.025 | No |
| 5. | Ardmore Avenue & Wilshire Boulevard | AM | 0.528 | A | 0.545 | A | 0.017 | No | 0.621 | B | 0.638 | B | 0.017 | No |
| | | PM | 0.550 | A | 0.591 | A | 0.041 | No | 0.643 | B | 0.685 | B | 0.042 | No |
| 6. | Normandie Avenue & 6th Street | AM | 0.605 | B | 0.611 | B | 0.006 | No | 0.695 | B | 0.701 | C | 0.006 | No |
| | | PM | 0.706 | C | 0.711 | C | 0.005 | No | 0.844 | D | 0.848 | D | 0.004 | No |
| 7. | Normandie Avenue-Irolo Street & Wilshire Boulevard | AM | 0.687 | B | 0.690 | B | 0.003 | No | 0.843 | D | 0.847 | D | 0.004 | No |
| | | PM | 0.625 | B | 0.633 | B | 0.008 | No | 0.850 | D | 0.860 | D | 0.010 | No |
| 8. | Irolo Street & 7th Street | AM | 0.484 | A | 0.483 | A | -0.001 | No | 0.571 | A | 0.570 | A | -0.001 | No |
| | | PM | 0.596 | A | 0.604 | B | 0.008 | No | 0.699 | B | 0.707 | C | 0.008 | No |

*[a] Los Angeles County Congestion Management Program arterial monitoring location.*
*Source: RAJU Associates, 2015.*

- LACMTA 20 – Line 20 is a local east/west line that provides service from Santa Monica to Downtown Los Angeles and travels primarily along Wilshire Boulevard within the study area. This line runs every day, including holidays, at a frequency of approximately 8-10 minutes during peak commute hours. The western terminus is at the intersection of Main Street and Pico Boulevard in Santa Monica. The eastern terminus is at the intersection of Maple Street and 7th Street in Downtown Los Angeles.

- LACMTA 66 - Line 66 is a local east/west line that provides service from Koreatown to Montebello and travels primarily along Western Avenue within the study area. This line runs on weekdays, at a frequency of approximately 5-15 minutes during peak commute hours. The western terminus is at the Metro Western/Wilshire Station in Koreatown. The eastern terminus is at the Metrolink Station in Montebello.

- LACMTA 206 – Line 206 is local north/south line that provides service from Hollywood to Athens and travels primarily along Normandie Avenue and Irolo Street within the study area. This line runs every day, including holidays, at a peak frequency of 7-8 minutes during peak commute hours. The northern terminus is at the intersection of Vermont Avenue and Hollywood Boulevard in Hollywood. The southern terminus is at the Vermont/Athens Metro Station in Athens.

- LACMTA 207 - Line 207 is a local north/south line that provides service from North Hollywood to Redondo Beach and travels primarily along Western Avenue within the study area. This line runs on weekdays, at a frequency of approximately 10-20 minutes during peak commute hours. The northern terminus is at the Metro Hollywood/Western Station in North Hollywood. The southern terminus is at the Metro Crenshaw Green Line Station in Redondo Beach.

- LACMTA 209 - Line 209 is a local north/south line that provides service from Wilshire Center to Athens and travels primarily along Wilshire Boulevard within the study area. This line runs on weekdays, at a frequency of approximately 15 minutes during peak commute hours. The northern terminus is at the Metro Wilshire/Western Station in Koreatown. The southern terminus is at the Metro Vermont/I-105 Station in Athens.

- LACMTA 710 - Line 710 is a north/south "Rapid Bus" line that provides service from Redondo Beach to Wilshire Center and travels primarily along Wilshire Boulevard within the study area. This line runs on the weekdays, at a peak frequency of approximately 15-20 minutes. The northern terminus is at the Metro Wilshire/Western Station in Koreatown. The southern terminus is at the South Bay Galleria Transit Center in Redondo Beach.

- LACMTA 720 - Line 720 is an east/west "Rapid Bus" line that provides service from Santa Monica to the City of Commerce and travels primarily along Wilshire Boulevard within the study area. This line runs every day, including holidays, at a peak frequency of 10-12 minutes. The

western terminus is at the intersection of 4th Street and Colorado Avenue in Santa Monica. The eastern terminus is at Commerce Center in the City of Commerce.

- LACMTA 757 - Line 757 is a north/south "Rapid Bus" line that provides service from North Hollywood to Redondo Beach and travels primarily along Western Avenue within the study area. This line runs on weekdays, at a frequency of approximately 10-15 minutes during peak commute hours. The northern terminus is at the Metro Hollywood/Western Station in North Hollywood. The southern terminus is at the Metro Crenshaw Green Line Station in Redondo Beach.

- FT 481 - Line 481 is an east/west express service line that travels from El Monte to Koreatown in Los Angeles and travels primarily along Wilshire Boulevard within the study area. This line runs Monday through Friday during peak commute hours and has a peak frequency of approximately 10 minutes. No service is provided on middays during the week, weekends and holidays. The western terminus is at the Metro Wilshire/Western Station in Koreatown. The eastern terminus is at the El Monte Transit Center in El Monte.

- BBB R7 – Line R7 is an east/west "Rapid Bus" line that provides service from Koreatown to Santa Monica and travels primarily along Wilshire Boulevard within the study area. This line runs Monday through Friday at a peak frequency of approximately 6 minutes. The western terminus is at the intersection of 6th Street and Broadway in Santa Monica. The eastern terminus is at the Metro Wilshire/Western Station in Koreatown. No service is provided on weekends and holidays.

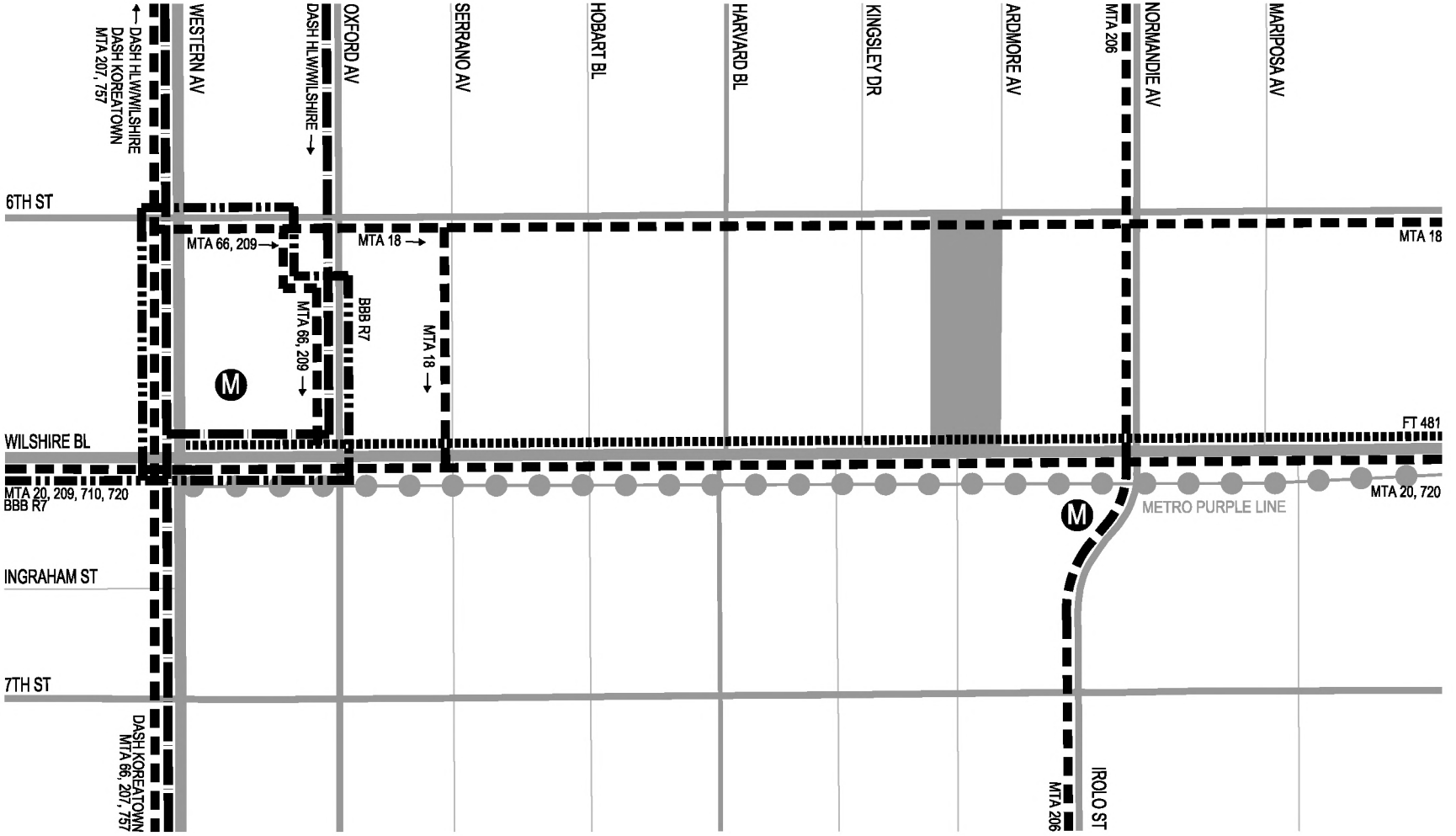
- LADOT Dash Hollywood/Wilshire – The Dash Hollywood/Wilshire Line is a local north/south line that provides service between Hollywood and Koreatown and travels primarily along Western Avenue within the study area. This line runs Monday through Friday at a frequency of 25 minutes during peak commute hours. The northern terminus is at the intersection of Argyle Avenue and Hollywood Boulevard in Hollywood. The southern terminus is at the intersection of Oxford Avenue and Wilshire Boulevard in Koreatown. No service is provided on weekends and holidays.

- LADOT Dash Wilshire Center/Koreatown – The Dash Wilshire Center/Koreatown Line is a local circular loop route that provides service within Koreatown. The line runs in a clockwise and counterclockwise direction and travels primarily along Western Avenue within the study area. This line runs every day, including holidays, at a frequency of 20 minutes during peak commute hours. The line commences clockwise service at the intersection of Western Avenue and Wilshire Boulevard. The line concludes service at the intersection of Western Avenue and San Marino Street.

- Metro Purple Line – The Metro Purple Line is a heavy-rail subway line that provides service between Downtown Los Angeles and Koreatown. This line runs every day, including holidays, at

a frequency of 5 minutes during peak commute hours. The western terminus is at the Metro Wilshire/Western Station in Koreatown. The eastern terminus is at Union Station in Downtown Los Angeles. The Metro Purple Line has a station at the intersection of Western Avenue/Wilshire Boulevard located west of the Project site and a station at the intersection of Normandie Avenue/Wilshire Boulevard located east and within one block of the Project site. The Metro Purple Line is planned to be extended nine miles westward to Westwood in the future. Per MTA, the first section of this extension would provide service to the City of Beverly Hills and is expected to be open for service by 2023.

These transit lines within the study area are illustrated on Figure IV-7. It can be observed from this figure that there is a robust transit network serving the study area. Further, the Wilshire Bus Rapid Transit (BRT) Project is proposing to convert existing curb lanes into bus and mixed flow right-turn-only lane operation in the peak periods on weekdays (7-9 AM and 4-7 PM). This BRT project would provide bus-only curb lanes along Wilshire Boulevard within the project study area. The first segment of the bus lanes between Western Avenue and South Park View Street opened in June 2013. All remaining segments of the bus-only lanes are estimated to be completed by 2015 and are included in the future conditions analyses.




## LEGEND:

- PROJECT SITE
- LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY (MTA)
- SANTA MONICA BIG BLUE BUS (BBB)
- METRO PURPLE LINE STATION
- FOOTHILL TRANSIT (FT)
- LOS ANGELES DEPARTMENT OF TRANSPORTATION (DASH)

N
Not to scale

Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-7
Existing Transit Lines

**Threshold of Significance**

***Intersection LOS***

LADOT's significance criteria for determining intersection LOS impacts are shown on Table IV-41.

**Table IV-41**
**LADOT Intersection Significance Thresholds**

| Intersection Conditions with Project Traffic | | Project-related Increase in CMA Value |
|---|---|---|
| LOS | CMA Value | |
| C | 0.701 - 0.800 | Equal to or greater than 0.04 |
| D | 0.801 - 0.900 | Equal to or greater than 0.02 |
| E, F | > 0.900 | Equal to or greater than 0.01 |
| *Source: LADOT.* | | |

**Traffic Impact Analysis**

***Project Traffic Generation***

Utilizing the ITE's *Trip Generation Manual*, 9th Edition trip rates, the Project's trip generation was determined. Table IV-42 presents details of the Project's trip generation including type of use, size, applicable rate, and trip generation estimates. Other calculations within the tables also provide for trip generation reductions from transit trips, existing use trip credit, internal capture trips, and pass-by trips per the City's traffic study guidelines.

As shown on Table IV-42, the Project would generate would result in an additional net total of approximately 1,218 daily trips of which 68 net trips would occur during the morning peak hour and 130 net trips during the evening peak hour.

***Project Trip Distribution***

The geographic distribution for Project trips was assumed as follows:

- To and From the North: 25%
- To and From the South: 25%
- To and From the East: 25%
- To and From the West: 25%

**Table IV-42**
**Estimated Project Trip Generation**

| Land Uses | Size | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|---|
| | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| **Proposed Project** | | | | | | | | |
| Apartments | 433 d.u. | 2,748 | 43 | 173 | 216 | 166 | 90 | 256 |
| Retail | 49,849 s.f. | 4,319 | 63 | 39 | 102 | 180 | 196 | 376 |
| *Project Trip Generation Total - Less (25%) Transit Trips* | | *5,300* | *80* | *159* | *239* | *260* | *215* | *474* |
| **Internal Capture Trip Credit (10%)* | | *-530* | *-8* | *-16* | *-24* | *-26* | *-22* | *-48* |
| ***Retail - Pass-By Trips (50%)* | | *-1,458* | *-17* | *-17* | *-34* | *-64* | *-63* | *-127* |
| **Existing Uses (to be removed)** | | | | | | | | |
| Medical Office Building | -67,733 s.f. | -2,555 | -128 | -34 | -162 | -57 | -148 | -205 |
| Restaurant [1] | -6,085 s.f. | -547 | -3 | -2 | -5 | -31 | -15 | -46 |
| Existing Trip Generation Total - Less (25%) Transit Trips | | -2,327 | -98 | -27 | -125 | -66 | -122 | -188 |
| ***Medical Office - Pass-By Trips (10%) | | 192 | 6 | 6 | 12 | 8 | 7 | 15 |
| ***Restaurant - Pass-By Trips (10%) | | 41 | 0 | 0 | 0 | 2 | 1 | 3 |
| **Project Net Trip Generation Total** | | **1,218** | **-37** | **105** | **68** | **114** | **16** | **130** |
| **Trip Rates [2]** | | | | | | | | |
| Apartment (ITE Land Use 220) | Trips per d.u. | [3] | 20% | 80% | [3] | 65% | 35% | [3] |
| Medical Office (ITE Land Use 720) | Trips per 1,000 s.f. | [4] | 79% | 21% | 2.39 | 28% | 73% | [4] |
| Retail/Shopping Center (ITE Land Use 820) | Trips per 1,000 s.f. | [5] | 62% | 38% | [5] | 48% | 52% | [5] |
| Quality Restaurant (ITE Land Use 931) | Trips per 1,000 s.f. | 89.95 | 50% | 50% | 0.81 | 67% | 33% | 7.49 |

** Internal capture trips determined after reduction of transit trips.*
*** Pass-by trips determined after reduction of transit trips and internal capture trip credit.*
**** Pass-by trips determined after reduction of transit trips.*
*[1] As proposed, the Project includes the demolition of an existing 11,470 square-foot commercial building. A 6,085 square-foot restaurant occupies the first floor. The second floor is occupied with a karaoke lounge with operating hour from 6 pm to 2 am. Therefore, existing trip credit was not taken for this use.*

**Table IV-42**
**Estimated Project Trip Generation**

| Land Uses | Size | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|---|
| | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| *[2] Trip Generation Manual, 9th Edition, ITE 2012* | | | | | | | | |
| *[3] Trip generation rates for apartment was calculated using the following equations:* | | | | | | | | |
| *Daily:* *T = 6.06 (X) + 123.56* | | | | | | | | |
| *AM Peak Hour:* *T = 0.49 (X) + 3.73* | | | | | | | | |
| *PM Peak Hour:* *T = 0.55 (X) + 17.65* *Where:* | | | | | | | | |
| *[4] Trip generation for medical office was calculated using the following formulas:* *T = Two-way volume of traffic (total trip-ends)* | | | | | | | | |
| *T = 40.89 (X) - 214.97* *X = Number of dwelling units* | | | | | | | | |
| *Daily:* *Ln(T) = 0.90 Ln(X) + 1.53* *Ln = Natural logarithm* *T = Two-way volume of traffic (total trip-ends)* | | | | | | | | |
| *PM Peak Hour:* *X = Area in 1,000 square feet of gross leasable area* | | | | | | | | |
| *[5] Trip generation for retail/shopping center was calculated using the following formulas:* | | | | | | | | |
| *Ln(T) = 0.65 Ln(X) + 5.83* | | | | | | | | |
| *Ln(T) = 0.61 Ln(X) + 2.24* | | | | | | | | |
| *Daily:* *Where:* | | | | | | | | |
| *AM Peak Hour:* *Ln(T) = 0.67 Ln(X) + 3.31* *Ln = Natural logarithm* | | | | | | | | |
| *PM Peak Hour:* *T = Two-way volume of traffic (total trip-ends)* | | | | | | | | |
| *X = Area in 1,000 square feet of gross leasable area* | | | | | | | | |
| *Source: RAJU Associates, 2015.* | | | | | | | | |

Intersection level trip distribution percentages are shown on Figures IV-8a and IV-8b. Based on these distribution assumptions, location and points of access of the project driveways, and trip generation estimates from the Project, traffic estimates of Project-only trips were developed. These Project-only trips are presented on Figure IV-9.

***Existing Plus Project Conditions***

Utilizing the Project-only traffic estimates developed for both AM and PM peak hours, traffic forecasts for the Existing (2015) plus Project conditions were developed. The existing (2015) traffic volumes were combined with the Project-only traffic volumes to obtain the Existing with Project traffic volume forecasts. The Existing (2015) plus Project traffic volumes during both AM and PM peak hours are presented on Figure IV-10.

Table IV-40 presents the results of the Existing (2015) plus Project traffic analysis. As indicated on the table, all eight of the study intersections are projected to continue to operate at LOS C or better during both the morning and evening peak hours.

Using the specified significant impact criteria, the traffic impacts at the analysis locations were determined. Table IV-40 identifies the individual impacts during both AM and PM peak hours at each of the analysis locations. As shown, based on LADOT's significance criteria and as confirmed by LADOT, the Project would not cause significant impacts at any of the analyzed intersections under the Existing (2015) plus Project conditions.

***Future Conditions***

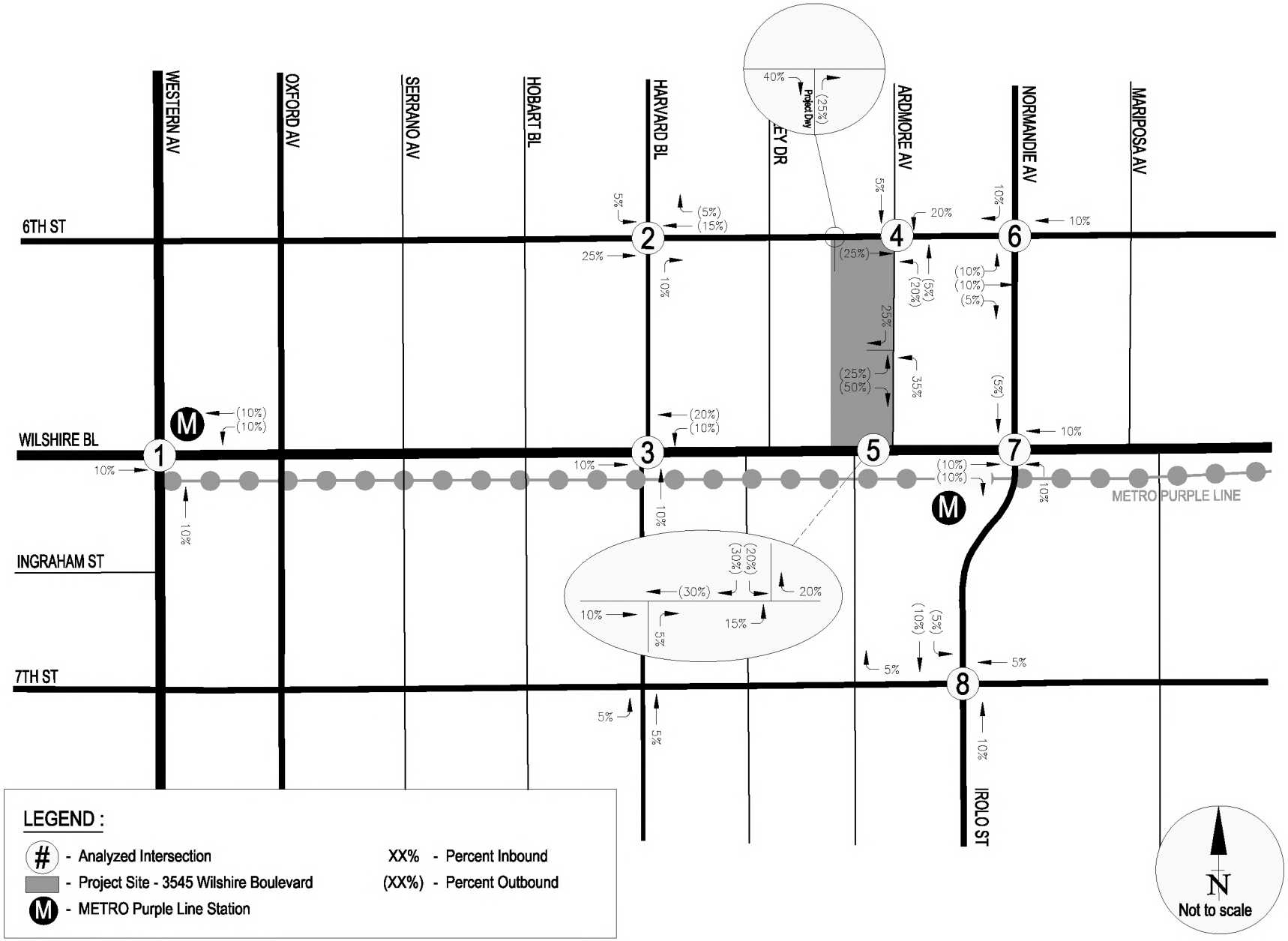
*Cumulative (2018) Base Traffic Volumes*

The traffic in the vicinity of the study area was estimated to increase at a rate of about 1.0 percent per year to reflect future increases in background traffic volumes due to regional growth and development that are expected to continue at this rate. With the assumed completion date of 2018, the Existing 2015 traffic volumes were adjusted upward by a factor of 3.0 percent to reflect this area-wide regional growth. The resulting Existing plus Ambient Growth (2018) traffic volumes are illustrated on Figure IV-11.

The second potential source of traffic growth in the study area is that expected from other future development projects in the vicinity. These related or "cumulative" projects are those developments that are planned and expected to be in place within the same timeframe as the Project. Data describing related projects in the area was solicited from the City. Sixty-one related projects were identified within the study area and are listed on Table IV-43. The locations of these projects are shown on Figure IV-12.

The trip generation estimates for the related projects within the City were provided by LADOT and are included on Table IV-43. As shown, the related projects would generate approximately 5,048 trips during

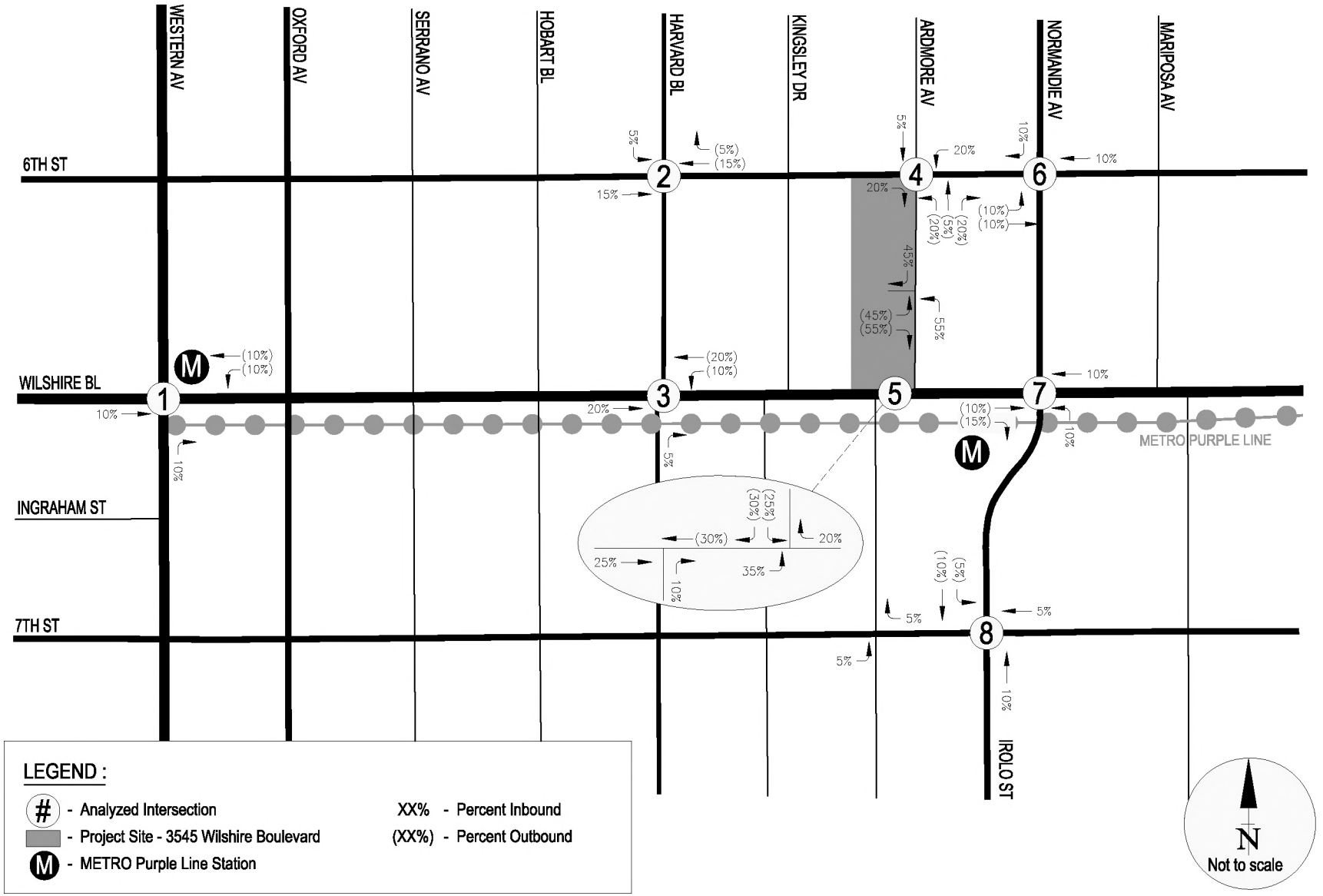
the morning peak hour and 5,773 trips during the evening peak hour. Figure IV-13 illustrates the related projects traffic assignment.




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

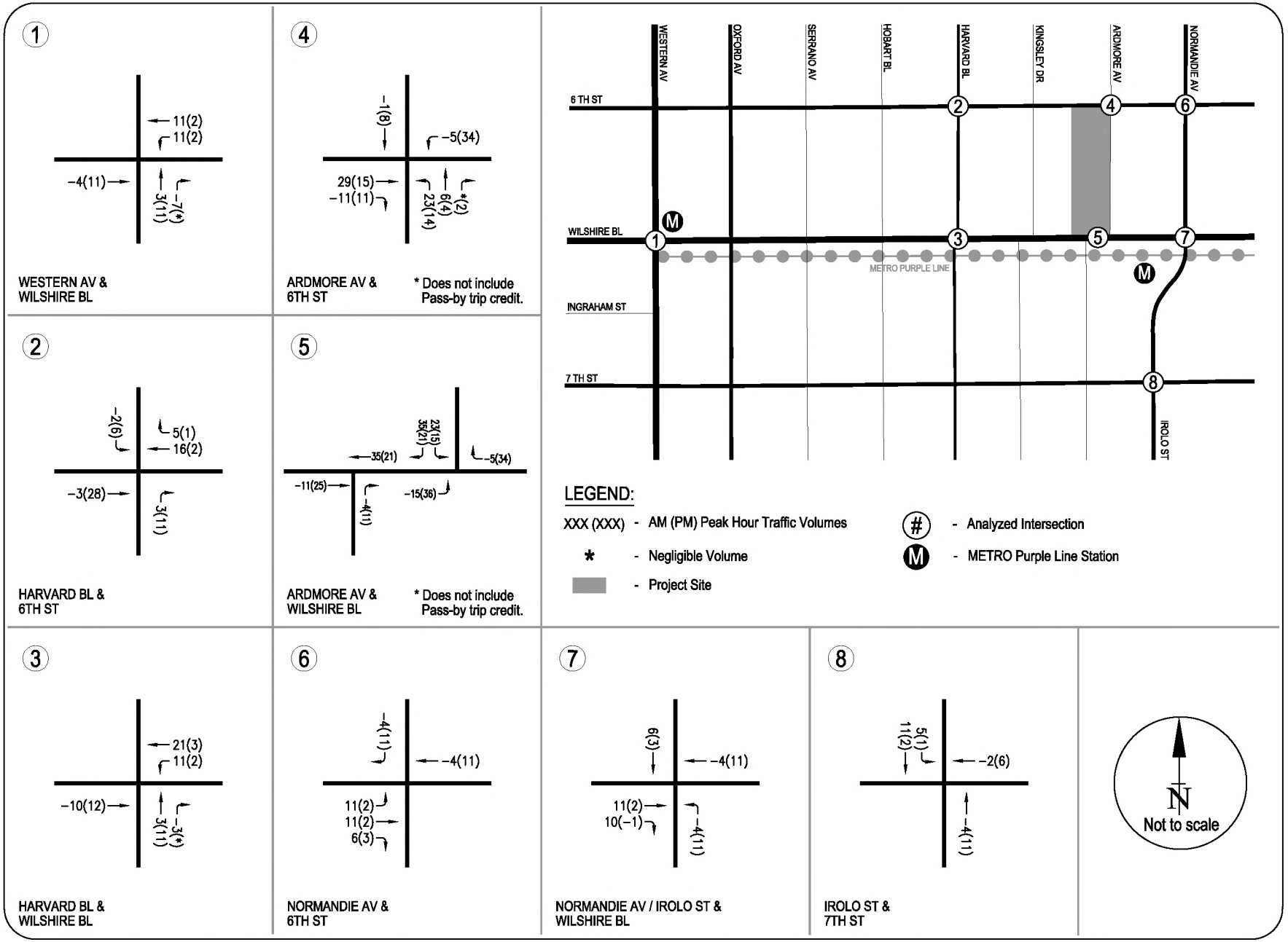
Figure IV-8a
Project Trip Distribution - Residential




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

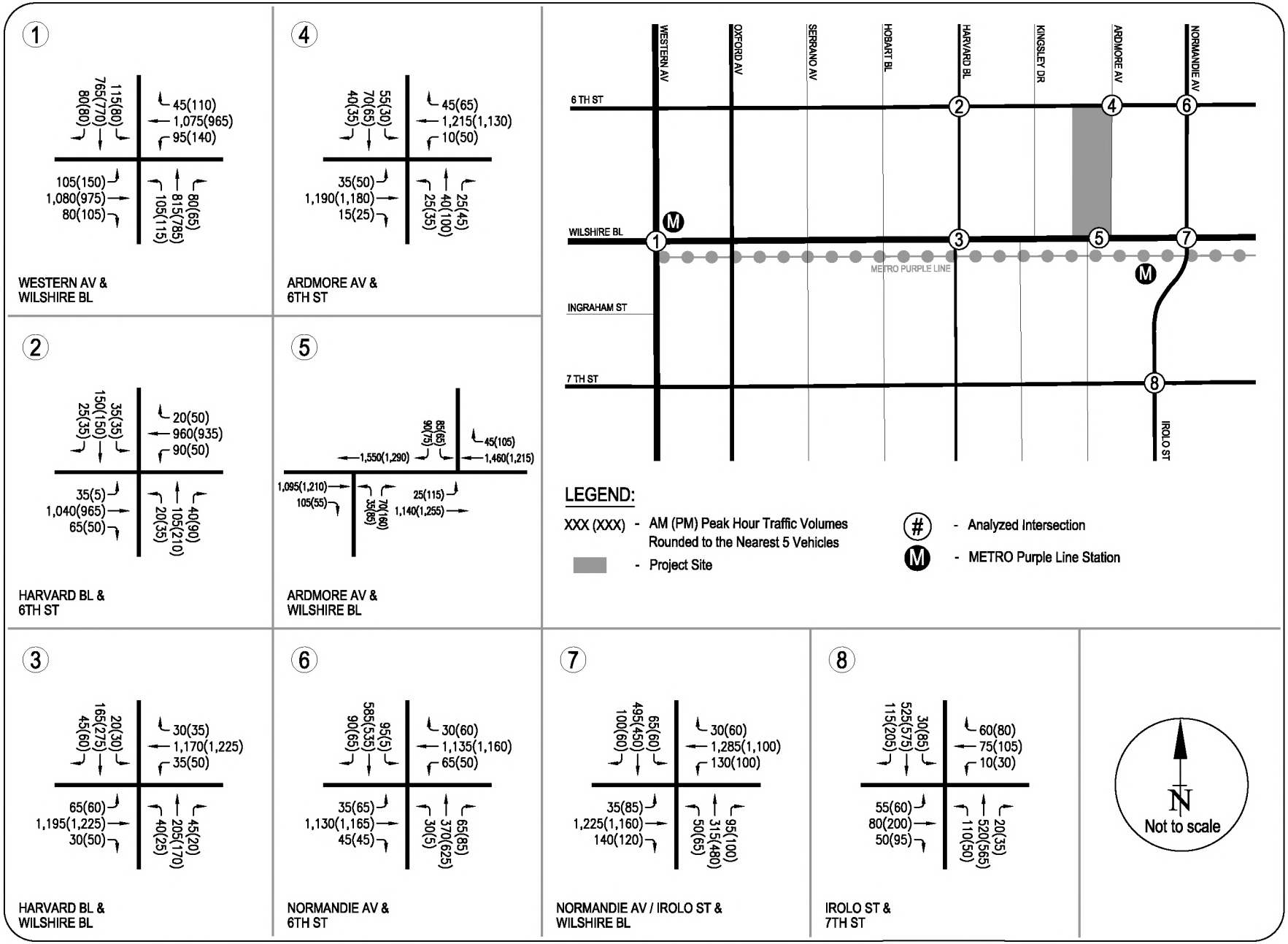
Figure IV-8b
Project Trip Distribution - Retail




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

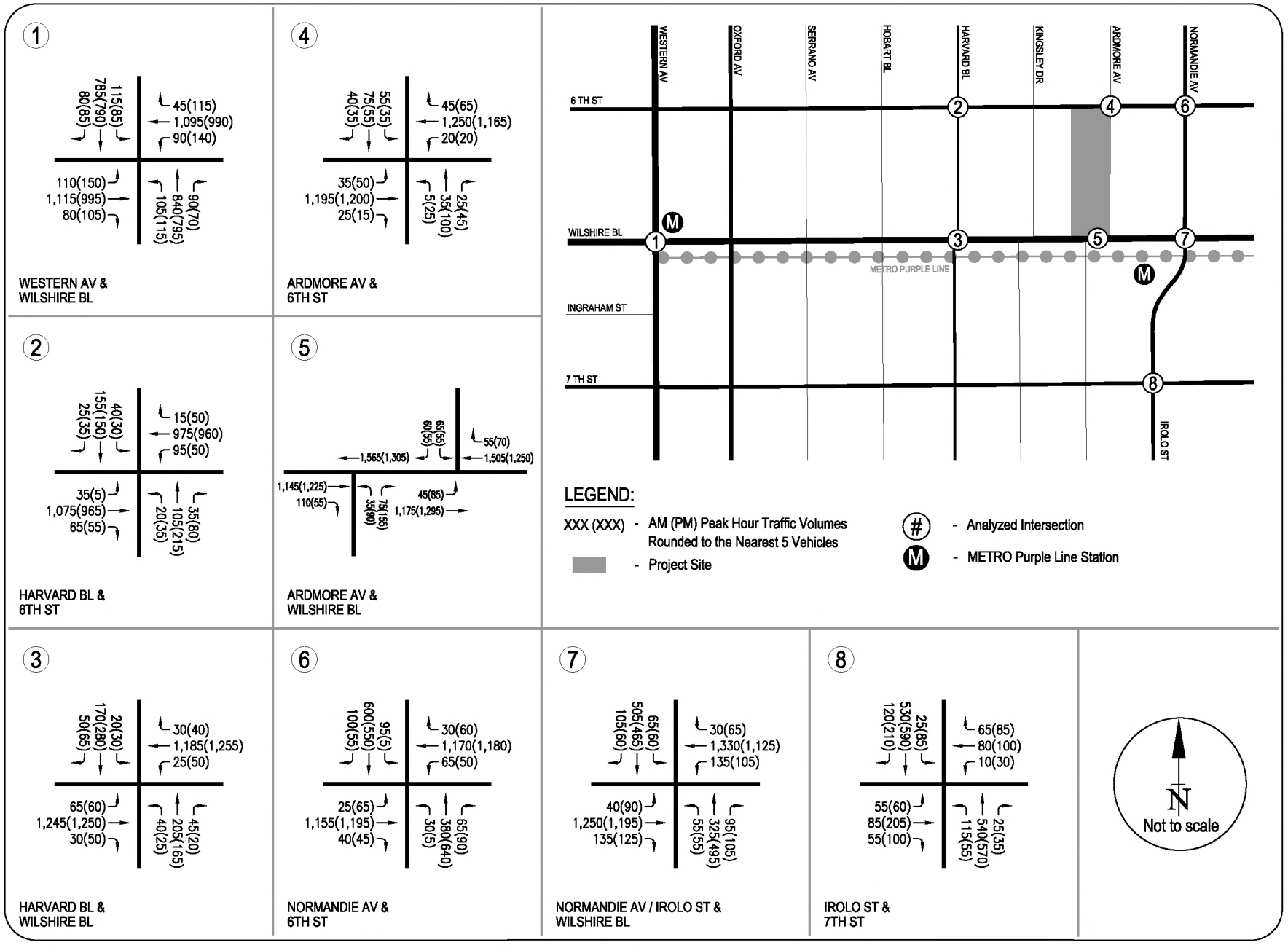
Figure IV-9
Project Only
Peak Hour Traffic Volumes




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-10
Existing (2015) Plus Project Conditons
Peak Hour Traffic Volumes




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-11
Existing With Ambient Growth (2018) Conditions
Peak Hour Traffic Volumes

**Table IV-43**
**Estimated Weekday Trip Generation of Related Projects**

| Map No. | Project Name | Location | Description | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| 1 | Hotel and Retail Project | 4110 W. 3rd Street | 173-room hotel and 2,780 s.f. retail | 1,185 | 46 | 34 | 80 | 42 | 44 | 86 |
| 2 | Camino Nuevo Charter School Relocation | 3400 W. 3rd Street | 656-student K-8 charter school | 764 | 146 | 120 | 266 | 43 | 45 | 88 |
| 3 | 6th & Virgil Project | 2968 W. 6th Street | 399 d.u. apartments & 20,000 s.f. commercial space | 2,943 | 73 | 154 | 227 | 168 | 93 | 261 |
| 4 | Hotel and Restaurant | 2965 W. 6th Street | 99-room hotel, 545 s.f. addition to restaurant | 688 | 26 | 18 | 44 | 25 | 25 | 50 |
| 5 | Mixed-Use Project | 2972 W. 7th Street | Construct 180 d.u. apartments and 15,000 s.f. retail. Demo 28,900 s.f. retail. | 486 | 7 | 59 | 66 | 43 | 8 | 51 |
| 6 | Mixed-Use Project | 2850 W. 7th Street | 206 d.u. apartments & 7,500 s.f. retail | 1,057 | 20 | 72 | 92 | 72 | 42 | 114 |
| 7 | Mixed-Use Project | 1329 W. 7th Street | 94 d.u. apartments and 2,000 s.f. retail | 662 | 16 | 37 | 53 | 39 | 22 | 61 |
| 8 | Restaurant and Bar | 1728 W. 7th Street | 9,600 s.f. restaurant and 3,500 s.f. bar | 362 | -30 | -40 | -70 | 50 | 14 | 64 |
| 9 | Mixed-Use Project | 3100 W. 8th Street | Construct 100 d.u. apartments and 4,418 s.f. retail. Demo 5,958 s.f. specialty retail, 2,575 s.f. restaurant and 963 s.f. dental office. | 661 | 12 | 39 | 51 | 38 | 28 | 66 |
| 10 | Affordable Housing & Assisted Living | 2924 W. 8th Street | 42 d.u. affordable apartments and 43 assisted units | 416 | 6 | 17 | 23 | 18 | 10 | 28 |
| 11 | Equitas Charter School | 2723 W. 8th Street | 450-student school, K-8th grade | 949 | 190 | 155 | 345 | 28 | 37 | 65 |
| 12 | Legal Aid Foundation of L.A. | 1550 W. 8th Street | Replace existing 12,000 s.f. office building with 34,000 s.f. office building | 230 | 29 | 4 | 33 | 6 | 26 | 32 |
| 13 | 15th Street Charter School | 2755 W. 15th Street | 300-student middle school | 486 | 68 | 57 | 125 | 24 | 24 | 48 |
| 14 | Church Project | 968 S. Berendo Street | 85,308 s.f. church | 535 | 23 | 8 | 31 | 3 | 9 | 12 |
| 15 | Berendo Apartments | 688 S. Berendo Street | 136 d.u. apartments | 678 | 10 | 42 | 52 | 41 | 22 | 63 |
| 16 | Berendo Apartments | 680 S. Berendo Street | 174 d.u. apartments | 1,000 | 15 | 61 | 76 | 61 | 32 | 93 |
| 17 | Apartment & Child Care | 3330 Beverly Boulevard | 40 d.u. apartments and 3,607 s.f. child care | 455 | 23 | 31 | 54 | 32 | 28 | 60 |
| 18 | Mixed-Use Project | 3200 Beverly Boulevard | 32 d.u. apartments and 5,870 s.f. retail | 632 | 4 | 16 | 20 | 39 | 32 | 71 |
| 19 | Apartment Hotel - Nest at Catalina | 621 S. Catalina Street | 82 d.u. apartment hotel & 1,547 s.f. retail/restaurant | 643 | 21 | 18 | 39 | 27 | 23 | 50 |
| 20 | Mixed-Use Project | 805 S. Catalina Street | 224 d.u. condominiums and 7,000 s.f. retail | 1,935 | 24 | 119 | 143 | 110 | 57 | 167 |
| 21 | Mixed-Use Project | 609 N. Dillon Avenue | Replace existing storage truck area with 137 d.u. apartments and 18,000 s.f. retail | 1,095 | 18 | 42 | 60 | 67 | 31 | 98 |
| 22 | Hotel Project | 1020 S. Fedora Street | 86-room hotel | 616 | 28 | 14 | 42 | 23 | 21 | 44 |

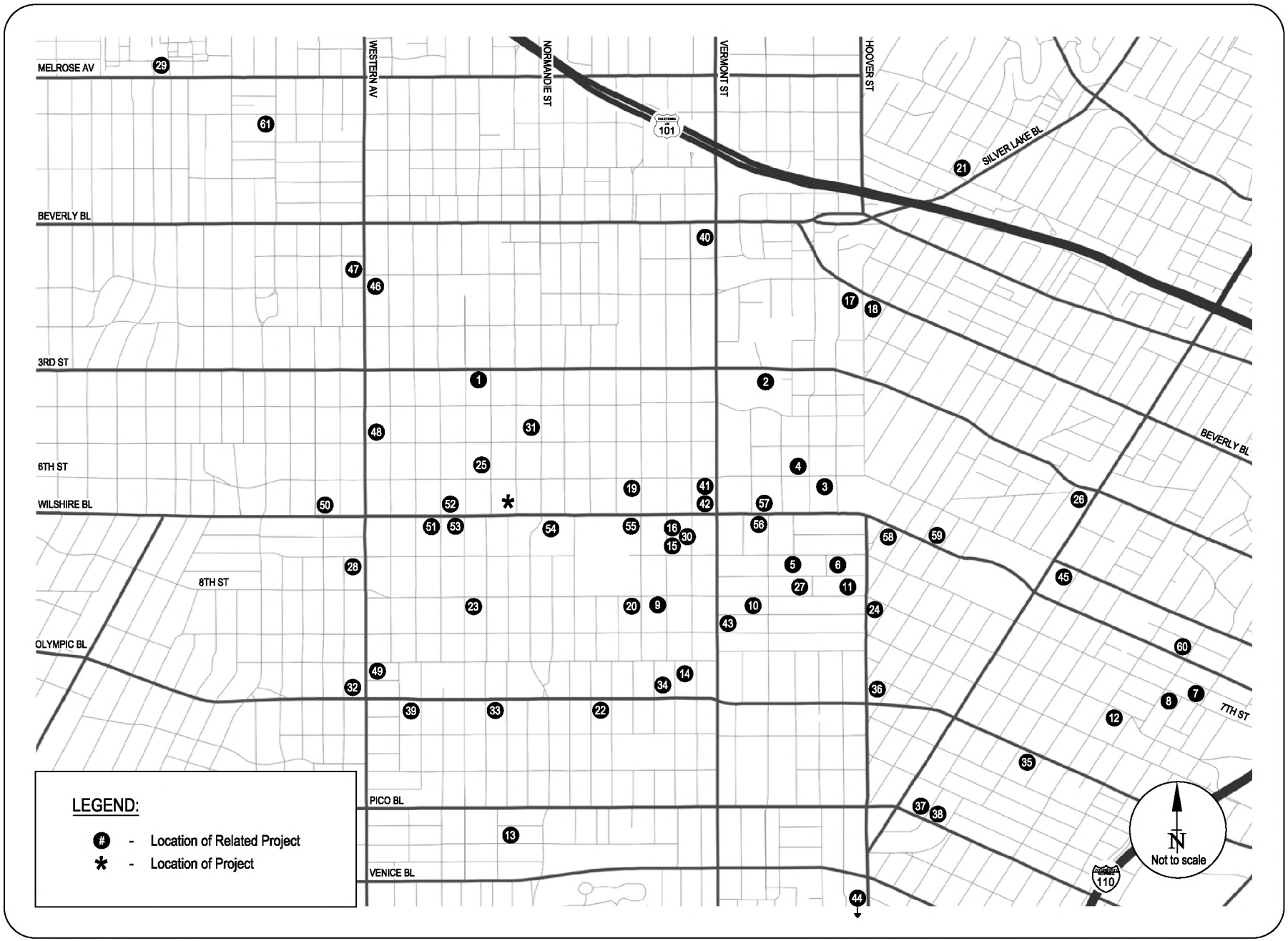
**Table IV-43**
**Estimated Weekday Trip Generation of Related Projects**

| Map No. | Project Name | Location | Description | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| 23 | Apartment Project | 800 S. Harvard Boulevard | 131 d.u. apartments and 7,000 s.f. retail | 827 | 14 | 32 | 46 | 44 | 33 | 77 |
| 24 | Condominiums and Retail | 820 S. Hoover Street | Construct 32 d.u. condominiums & 4,500 s.f. retail and demo 1,435 s.f. office | 414 | 7 | 15 | 22 | 18 | 14 | 32 |
| 25 | Apartment Project | 535 S. Kingsley Avenue | 85 d.u. apartments | 543 | 8 | 31 | 39 | 36 | 19 | 55 |
| 26 | Apartment Project | 422 S. Lake Street | 80 d.u. apartments | 532 | 8 | 33 | 41 | 33 | 17 | 50 |
| 27 | Apartment Project | 2929 Leeward Street | 80 d.u. apartments | 476 | 7 | 33 | 40 | 44 | 21 | 65 |
| 28 | Mixed-Use Project | 700 S. Manhattan Place | 163 d.u. apartments, 2,500 s.f. retail and 7,500 s.f. restaurant | 1,271 | 19 | 58 | 77 | 72 | 45 | 117 |
| 29 | Paramount Studios | 5555 W. Melrose Avenue | Studio expansion | 9,830 | 712 | 213 | 925 | 297 | 736 | 1,033 |
| 30 | Apartment Project | 685 S. New Hampshire Avenue | 177 d.u. apartments | 1,000 | 15 | 61 | 76 | 61 | 32 | 93 |
| 31 | Apartment Project | 411 S. Normandie Avenue | 224 d.u. apartments | 1,407 | 22 | 86 | 108 | 87 | 47 | 134 |
| 32 | Office and Apartments | 3323 W. Olympic Boulevard | 40 d.u. apartments and 27,720 s.f. medical office | 1,267 | 57 | 30 | 87 | 44 | 82 | 126 |
| 33 | Mixed-Use Project | 3060 W. Olympic Boulevard (Olympic Bl/Kingsley Av) | Construct 226 d.u. apartments and 16,907 s.f. retail. Demo 9,163 s.f. retail. | 1,567 | 25 | 78 | 103 | 90 | 56 | 146 |
| 34 | Medical Office, Health Spa, and Retail | 2789 W. Olympic Boulevard | 20,607 s.f. retail and 2,780 s.f. office | 612 | 16 | 8 | 24 | 25 | 29 | 54 |
| 35 | Hotel Project | 1700 W. Olympic Boulevard | 160-room hotel | 1,157 | 44 | 32 | 76 | 45 | 42 | 87 |
| 36 | Apartment Project | 1011 S. Parkview Street | 108 d.u. apartments | 594 | 9 | 38 | 47 | 38 | 19 | 57 |
| 37 | Laborers Local 300 HQ | 2005 W. Pico Boulevard | 30,300 s.f. office including a 4,500 s.f. assembly hall | 224 | 28 | 4 | 32 | 5 | 25 | 30 |
| 38 | Charter High School | 1929 W. Pico Boulevard | 480-student high school | 821 | 140 | 66 | 206 | 20 | 42 | 62 |
| 39 | Apartment Project | 1011 S. Serrano Avenue | 91 d.u. apartments | 545 | 8 | 33 | 41 | 32 | 18 | 50 |
| 40 | AMCAL - Meridian Apartments | 241 N. Vermont Avenue | 100 d.u. apartments and 5,000 s.f. retail | 510 | 7 | 38 | 45 | 33 | 16 | 49 |
| 41 | Korean American National Museum | 605 S. Vermont Avenue | 101 d.u. apartments and 30,937 s.f. museum | 745 | 17 | 38 | 55 | 41 | 37 | 78 |
| 42 | Mixed-Use Project | 627 S. Vermont Avenue | 173 d.u. apartments and 12,500 s.f. restaurant | 1,304 | 34 | 72 | 106 | 75 | 39 | 114 |
| 43 | Mixed-Use Project | 864 S. Vermont Avenue | 411 d.u. apartments and 43,800 s.f. retail | 3,202 | 24 | 129 | 153 | 164 | 101 | 265 |
| 44 | Pharmacy/Drug Store | 1302 W. Washington Boulevard | 16,572 s.f. pharmacy/drug store (CVS) | 414 | -33 | -18 | -51 | 21 | 12 | 33 |

**Table IV-43**
**Estimated Weekday Trip Generation of Related Projects**

| Map No. | Project Name | Location | Description | Daily | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | IN | OUT | TOTAL | IN | OUT | TOTAL |
| 45 | Westlake Theater Apartments | 619 S. Westlake Avenue | 52 d.u. apartments | 254 | 3 | 17 | 20 | 16 | 8 | 24 |
| 46 | Western Galleria Market | 100 N. Western Avenue | 30,000 s.f. supermarket and 98 d.u. apartments | 940 | 17 | 40 | 57 | 54 | 38 | 92 |
| 47 | Restaurants | 135 N. Western Avenue | 11,904 s.f. restaurant | 457 | 2 | 2 | 4 | 25 | 13 | 38 |
| 48 | Mixed-Use Project | 450 S. Western Avenue | 130,500 s.f. mixed-use project | 3,019 | 47 | 29 | 76 | 138 | 138 | 276 |
| 49 | Mixed-Use Project | 940 S. Western Avenue | 81 d.u. apartments and 8,000 s.f. retail | 380 | 9 | 28 | 37 | 22 | 15 | 37 |
| 50 | Apartment Project | 3875 W. Wilshire Boulevard | 220 d.u. apartments | 1,238 | 19 | 77 | 96 | 77 | 42 | 119 |
| 51 | Mixed-Use Project | 3670 W. Wilshire Boulevard | 378 d.u. condominiums and 8,000 s.f. other | 2,480 | 55 | 142 | 197 | 144 | 76 | 220 |
| 52 | Wilshire Temple Master Plan | 3663 W. Wilshire Boulevard | School and office improvements | 825 | 94 | 44 | 138 | 20 | 3 | 23 |
| 53 | Apartment Project | 3640 W. Wilshire Boulevard | 209 d.u. apartments | 1,182 | 18 | 72 | 90 | 73 | 40 | 113 |
| 54 | Health Club | 3470 W. Wilshire Boulevard | 20,178 s.f. health club replacing 20,178 s.f. office | 231 | -13 | 6 | -7 | 22 | -1 | 21 |
| 55 | Apartment Project | 3350 W. Wilshire Boulevard | 121 d.u. apartments | 728 | 11 | 43 | 54 | 47 | 25 | 72 |
| 56 | Southwestern Law School Student Housing Campus | 3050 W. Wilshire Boulevard | 133 d.u. student housing, 400-450 seat lecture hall, 43,400 s.f. administration/academic use | -1,337 | -35 | -16 | -51 | -45 | -52 | -97 |
| 57 | Mixed-Use Project | 3033 W. Wilshire Boulevard | 189 d.u. condominiums and 5,540 s.f. retail space | 816 | 12 | 49 | 61 | 45 | 29 | 74 |
| 58 | Chuck E. Cheese's Restaurant | 2706 W. Wilshire Boulevard | 16,418 s.f. restaurant/entertainment | 1,002 | 6 | 3 | 9 | 51 | 32 | 83 |
| 59 | Mixed-Use Project (Wilshire Coronado) | 2525 W. Wilshire Boulevard | 160 d.u. condominiums and 7,500 s.f. retail space | 1,160 | 16 | 60 | 76 | 61 | 36 | 97 |
| 60 | Valencia Project | 1501 W. Wilshire Boulevard | 217 d.u. apartments, 2,400 s.f. retail and 4,450 s.f. restaurant | 1,163 | -11 | 18 | 7 | 38 | 23 | 61 |
| 61 | Apartment Project | 525 N. Wilton Place | 88 d.u. apartments | 449 | 6 | 28 | 34 | 27 | 14 | 41 |
| | | | **RELATED PROJECTS TRIP GENERATION TOTAL** | **62,727** | **2,219** | **2,829** | **5,048** | **3,139** | **2,634** | **5,773** |

*[1] List of related projects and their trip generation estimates provided by LADOT, May 2015.*




Source: RAJU Associates, Inc., 2016

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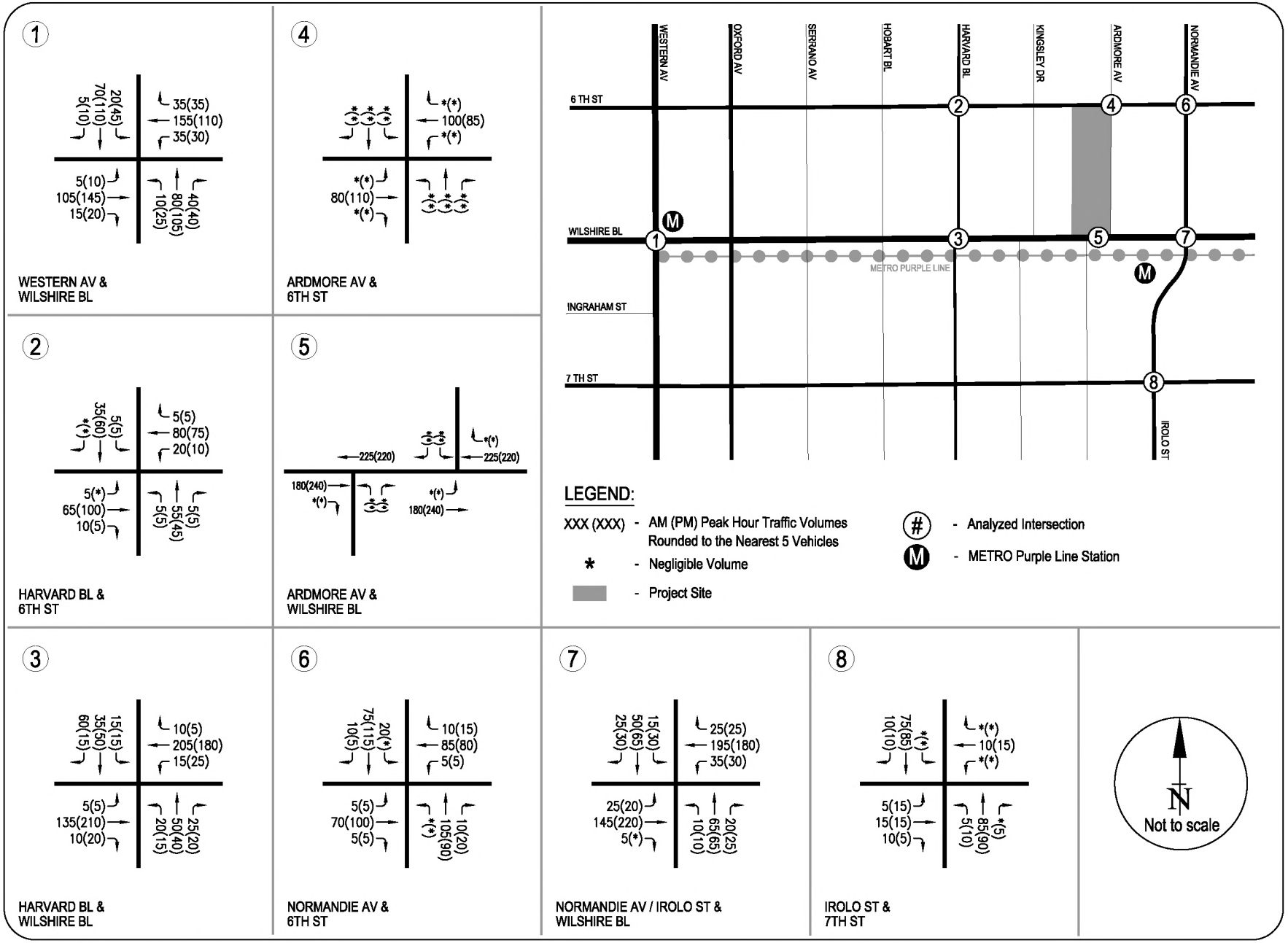
Figure IV-12
Locations of Related Projects




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-13
Related Projects Only
Peak Hour Traffic Volumes

These related projects' traffic estimates were added to the Existing plus Ambient Growth traffic to obtain the Cumulative (2018) Base traffic volumes. Figure IV-14 provides the Cumulative (2018) Base traffic volumes at each of the analysis intersections during both AM and PM peak hours. These volumes represent Future (2018) Cumulative Base (without project) conditions.

Table IV-40 also presents the results of the Cumulative (2018) Base (without project) traffic analysis. As indicated in the table, seven of the eight study intersections are projected to operate at LOS D or better during both the morning and evening peak hours. The remaining location, the intersection of Western Avenue/Wilshire Boulevard, is projected to operate at LOS E during the morning and evening peak hours.

*Cumulative (2018) Plus Project Traffic Volumes*

Utilizing the Project-only traffic estimates developed for both AM and PM peak hours, traffic forecasts for the Cumulative (2018) plus Project conditions were developed. The Cumulative (2018) Base traffic forecasts were combined with the Project-only traffic volumes to obtain the Future with Project traffic volume forecasts. The Cumulative (2018) plus Project traffic volumes during both AM and PM peak hours are presented on Figure IV-15.

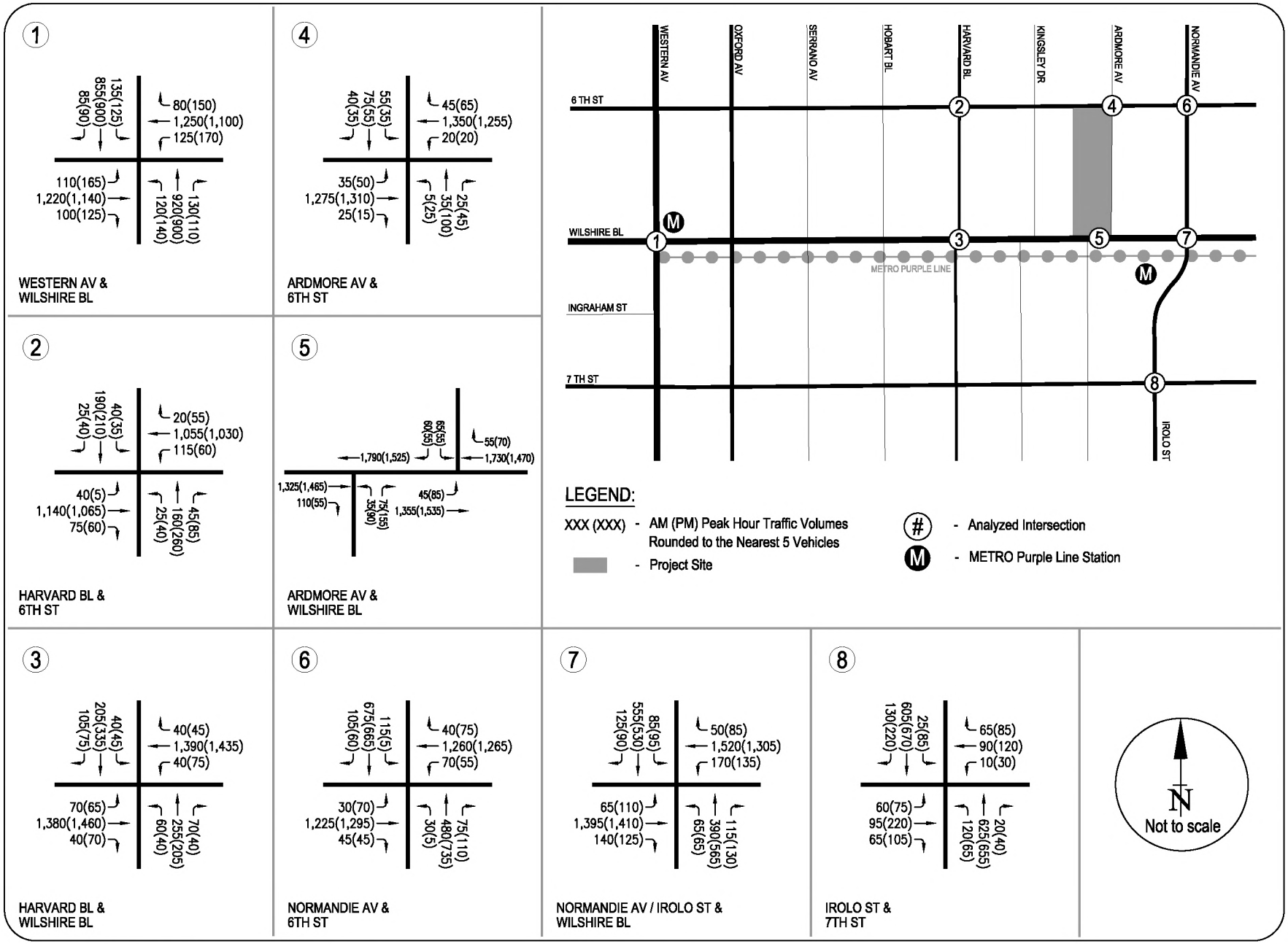
*Cumulative (2018) plus Project Traffic Conditions*

The results of the Cumulative (2018) plus Project analysis are also summarized on Table IV-40. Table IV-40 indicates that under Cumulative (2018) plus Project conditions both morning and evening peak operating conditions would be similar to those projected for the Cumulative (2018) Base conditions. Seven of the eight study intersections are projected to operate at LOS D or better during both the morning and evening peak hours. The remaining location, the intersection of Western Avenue/Wilshire Boulevard, is projected to operate at LOS E during the morning and evening peak hours.

Using the specified significant impact criteria, the traffic impacts at the analysis locations were determined. Table IV-40 identifies the individual impacts during both AM and PM peak hours at each of the analysis locations. Based on LADOT's significance criteria and as confirmed by LADOT, the Project would not cause significant impacts at any of the analyzed intersections under the Cumulative (2018) plus Project conditions.

**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 count congestion management agency for designated roads or highways?**

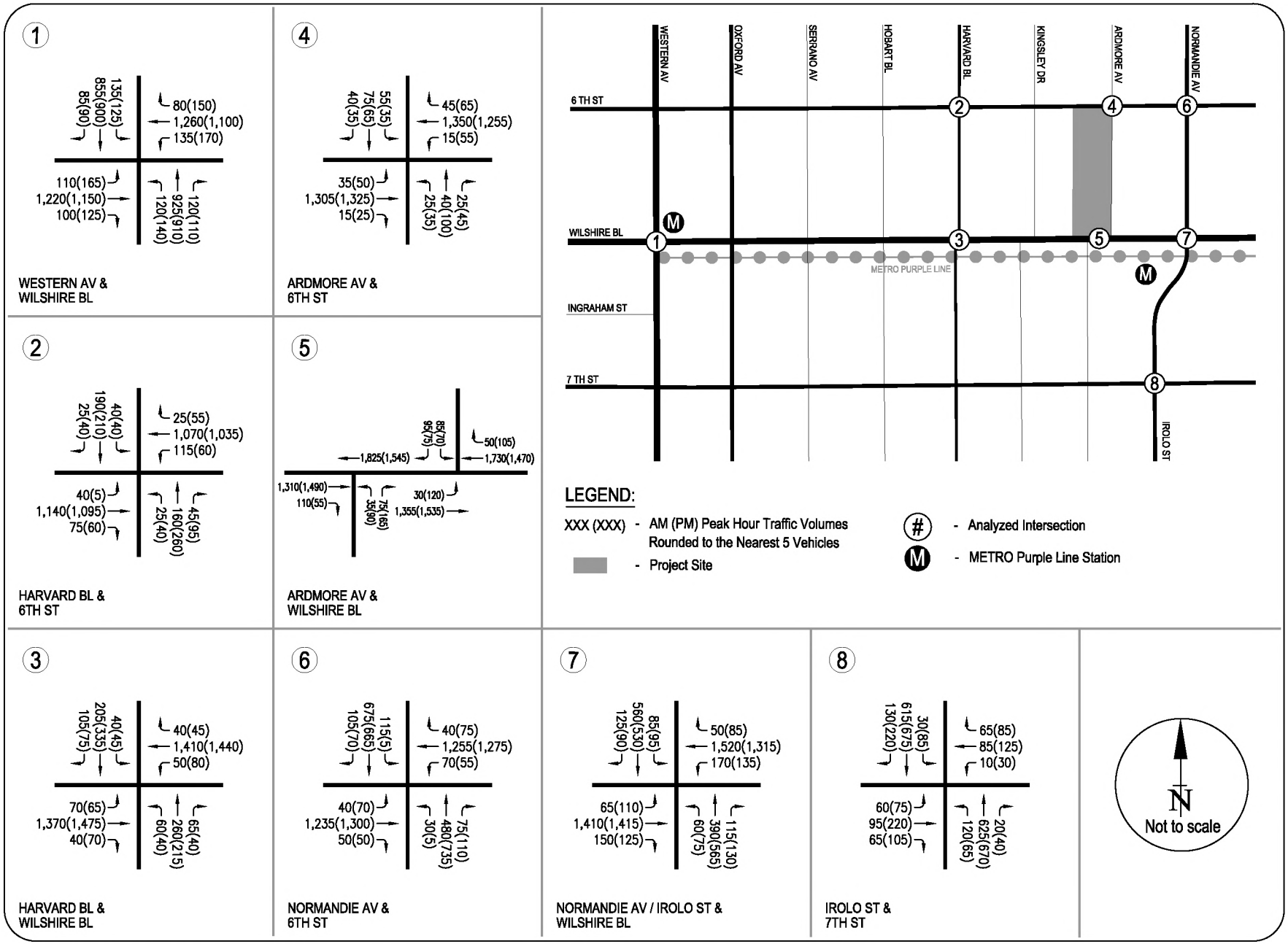
**Less Than Significant Impact.** The traffic impact guidelines of the 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-14
Cumulative (2018) Base Conditions
Peak Hour Traffic Volumes




Source: RAJU Associates, Inc., 2016

CAJA Environmental Services, LLC

Figure IV-15
Cumulative (2018) Plus Project Conditions
Peak Hour Traffic Volumes

The nearest CMP arterial monitoring location to the Project site is the intersection of Alvarado Street and Wilshire Boulevard. Based on the incremental Project trip generation estimates presented on Table IV-39, the Project would not add 50 or more new trips per hour to this location. Therefore, no further analysis of CMP arterial monitoring locations is required.

The nearest mainline freeway monitoring locations to the Project site include the Hollywood Freeway (US-101) south of Santa Monica Boulevard, the Santa Monica Freeway (I-10) at Budlong Avenue and the Pasadena Freeway (I-110) south of US-101 Freeway. Based on the incremental Project trip generation estimates, the Project would not add 150 or more new trips per hour to these locations in either direction. Therefore, no further analysis of CMP freeway monitoring stations is 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.** The Project includes two high-rise residential buildings – a 32-story (approximately 378 feet in height measured from the lowest point on the Project site) building on the southern part of the site facing Wilshire Boulevard and a 14-story (approximately 201 feet in height measured from the lowest point on the Project site) building on the northern part of the Project site facing 6th Street. The heights of these buildings are within the height range of the existing buildings within the Project area. The Project site is not located near any airports. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur.

**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.** Vehicular access to the Project would be provided via a driveway on 6th Street, allowing right-turn in and right-out access to the parking structure. Two additional driveways on Ardmore Avenue also would provide access to the Project site. The southern of these two driveways would provide inbound access to the retail-related parking spaces on the ground-floor level of the parking structure and two-way access to the upper residential parking levels, while the northern driveway would operate as one-way outbound from the ground-floor parking level. A valet car-drop-off area would be included on the ground-floor parking level. All ingress/egress points associated with the Project would be designed and constructed in accordance with City Department of Building and Safety, Bureau of Engineering, and LAFD requirements. The Project does not include development of any roadways or intersection and would not include the use of farm equipment. Therefore, Project impacts related to hazardous roadway features would be less than significant.

**e) Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of

Engineering, and LAFD standards and requirements for design and construction. Therefore, the Project would not result in any significant impacts related to emergency access.

**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 supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**Less Than Significant Impact.** The Project includes development of a high-density mixed-use (residential units over ground-floor retail) project within approximately 300 feet of a Metro transit station and various other bus lines that run on Wilshire Boulevard, and would allow residents of the Project to easily use transit for traveling in lieu of driving. Also, the Project includes 652 bicycle parking spaces – 428 long-term residential spaces, 38 long-term retail spaces, 44 short-term residential spaces, and 38 short-term retail spaces, exceeding LAMC bicycle space parking requirements for the Project. During the grading, demolition, and construction phases of the project there is potential for pedestrian pathways to be blocked or closed. However, prior to closure of a sidewalk within the public right-of-way, the closure along the pedestrian protection would be required to be approved by the Bureau of Street Services and the Department of Building and Safety, pursuant to LAMC Section 62.45 and 91.3306. For these reasons, the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation, and impacts related to this issue would be less than significant.

# 17. UTILITIES AND SERVICE SYSTEMS

**a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?**

**Less Than Significant Impact.** The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 362 mgd. Thus, there is approximately 88 mgd available capacity.

As shown on Table IV-44 the Project would result in an approximate net increase of 49,044 gallons of wastewater per day (or 0.049 mgd).[79] With a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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[79] *This conservatively assumes the Project's wastewater generation would equal its water consumption.*

**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.** The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

**Table IV-44**
**Estimated Water Consumption**

| Land Uses | Size | Consumption Rate[1] | Total (gallons/day) |
|---|---|---|---|
| **Existing** | | | |
| Medical Office | 67,733 sf | 0.25 gpd/sf | 16,933 |
| Commercial Retail | 11,470 sf | 0.08 gpd/sf | 918 |
| | | *Total Existing* | *17,851* |
| **Proposed** | | | |
| Residential | | | |
| Studio | 7 du | 80 gpd/du | 560 |
| 1-bedroom | 125 du | 120 gpd/du | 15,000 |
| 2-bedroom | 260 du | 160 gpd/du | 41,600 |
| 3-bedroom | 36 du | 200 gpd/du | 7,200 |
| Commercial | | | |
| Retail | 31,689 sf | 0.08 gpd/sf | 2,535 |
| | | *Subtotal Proposed* | *66,895* |
| | | *Less Existing* | *(17,851)* |
| | | **Net Total** | **49,044** |

*sf = square feet* *du= dwelling unit*
[1] *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, March 20, 2002.*

As shown on Table IV-44, the Project would result in a net consumption increase of approximately 49,044 gallons of wastewater per day (or 0.049 mgd). With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

**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?**

**Less Than Significant Impact.** As discussed in response to Checklist Question 9e, the Project would not exceed the capacity of the existing or planning drainage system. Therefore, Project impacts related to stormdrain capacity would be less than significant.

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

**Less Than Significant Impact.** As shown on Table IV-44, the Project would result in a net increase of approximately 49,044 gallons per day. This estimated water consumption does not take into consideration the effectiveness of current water conservation measures that are required by the City. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and rising to 652,000 in 2020. According to LADWP, any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) will be offset with MWD purchases to rise to the level of demand. Overall, any project that is consistent with the General Plan has been taken into account in the planned growth in water demand. As discussed previously, the Project is consistent with the General Plan. In addition, the Project would be required to comply with all applicable mandatory water conservation in the Los Angeles Green Building Code. Further, the Project would be required to comply with the City's Emergency Water Conservation Plan. Therefore, Project impacts related to water supply would be less than significant.

**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.** As discussed in response to Checklist Question 17a, with a remaining daily capacity of 88 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

**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.** Most of the solid waste generated in the City is disposed of at the Sunshine Canyon Landfill and Chiquita Canyon Landfill. The Sunshine Canyon Landfill is jointly operated by the City and the County (each operates separate portions of the landfill). The Sunshine Canyon Landfill currently has a remaining capacity of 80,500,000 tons, with a permitted intake of 12,100 tons per day (tpd) and currently accepts an average of 6,949 tpd and therefore, has a remaining daily

intake availability of 5,151 tpd..[80] The Chiquita Canyon Landfill currently has a remaining capacity of 6,233,000 tons, with a permitted intake of 5,000 tpd and currently accepts an average of 3,804 tpd, with a remaining daily intake availability of 1,196 tpd.[81] Thus, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill have a combined remaining permitted daily intake of 6,347 tpd. The Sunshine Canyon Landfill has an estimated remaining life of 23 years, and the Chiquita Canyon Landfill has an estimated remaining life of 5 years.[82] An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy).[83]

The Project is estimated to generate an increase of approximately 880 pounds per day (or 0.44 tons/day) of solid waste.[84] With a remaining daily capacity of 6,347 tpd, the existing landfill capacity would be adequate to accommodate the Project's solid waste generation. Therefore, Project impacts related to solid waste would be less than significant.

**g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The Project would be required to comply with all applicable federal, state, and local statutes and regulations related to solid waste generation, and no significant impacts related to this issue would occur.

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[80] *County of Los Angeles Department of Public Works, Solid Waste Information Management System, http://dpw.lacounty.gov/epd/swims/OnlineServices/search-solid-waste-sites-esri.aspx, accessed November 19, 2014.*

[81] *Ibid.*

[82] *Ibid.*

[83] *Ibid.*

[84] *Solid waste generation assumes 10 pound per unit per day. Generation rate source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.*

# 18. MANDATORY FINDINGS OF SIGNIFICANCE

**a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

**Less Than Significant Impact.** For the reasons stated in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

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

**Less Than Significant Impact.** For the reasons stated in this Initial Study, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

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

**Less Than Significant Impact.** For the reasons stated in this Initial Study, the Project would not cause substantial adverse effects on human beings, either directly or indirectly.

# V. PREPARERS OF THE INITIAL STUDY AND PERSONS CONSULTED

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