City of Los Angeles

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Department of City Planning Policy Planning Bureau City Hall • 200 N. Spring Street, Suite 667 • Los Angeles, CA 90012

INITIAL STUDY / NEGATIVE DECLARATION

CENTRAL CITY WEST SPECIFIC PLAN AMENDMENT

Environmental Case Number: ENV-2018-5223-ND Planning Case Number: CPC-2018-5222-SP

Project Location: The Project Area includes all lots within the Central City West Specific Plan

Area.

Council Districts: 1 – Gil Cedillo and 13 – Mitch O'Farrell

Project Description:

The Proposed Project would modify the affordable housing requirements of the Central City West Specific Plan (Specific Plan). The Proposed Project, by itself, does not propose or authorize any development. The existing affordable housing requirements are triggered when the proposed development is a multiple-family residential or mixed-use project consisting of 11 dwelling units or more. The proposed modifications to the Specific Plan's existing affordable housing requirements would better align the requirements with changes to State and City regulations that were adopted subsequent to the adoption of the Specific Plan which similarly aim to encourage affordable housing within multiple-family residential and mixed use projects. Since the Specific Plan's adoption in 1991, several regulations, including, but not limited to, the State Density Bonus Implementation Ordinance; the City Density Bonus laws, the Affordable Housing Linkage Fee Ordinance, the Transit Oriented Communities Affordable Housing Incentive Program (TOC); and Measure JJJ, require and/or create incentives for development projects to provide a certain percentage of dwelling units as affordable dwelling units or pay fees. Future development projects consisting of 11 or more dwelling units will be required to comply with these revised provisions. The proposed ordinance includes the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the replacement of the Specific Plan's "Housing Linkage fee" and the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance; and phasing of the implementation of the modified housing requirements.

PREPARED BY:

City of Los Angeles
Department of City Planning
Policy Planning Bureau

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INTRODUCTION

The subject of this Initial Study/Negative Declaration (IS/ND) is an amendment to the Central City West Specific Plan (Specific Plan). The proposed ordinance (Project), by itself, does not propose or authorize any development. The regulations are triggered by application for a building permit for a "development project" defined as the construction, erection, addition to, or alteration of any building or structure, or use of land, or change of use, on a lot to a multiple-family residential or mixed use project consisting of 11 dwelling units or more located within the Central City West Specific Plan Area (Refer to Figure 1). The proposed Project would modify the existing Specific Plan Housing Requirements.

The Project Area includes all lots within the Central City West Specific Plan Area of the City of Los Angeles (City). A full description of the proposed Project is provided in the Section titled **Project Description**.

PROJECT INFORMATION

Project Title: Central City West Specific Plan Amendment

Project Location: Central City West Specific Plan Area generally bounded by Hollywood

Freeway (US-101) to the north, the Harbor Freeway (SR-110) to the east, Olympic Boulevard to the south, and to the west by Glendale Boulevard

and Union Avenue.

<u>Lead Agency</u>: City of Los Angeles Department of City Planning

200 N. Spring St., Room 667 Los Angeles, CA 90012

ORGANIZATION OF INITIAL STUDY/ NEGATIVE DECLARATION

This Initial Study is organized into four sections as follows:

<u>Introduction</u>: This section provides introductory information such as the Project title, Project location, and the lead agency for the Project.

<u>Project Description</u>: This section provides a detailed description of the environmental setting and the Project, including Project characteristics and environmental review requirements.

<u>Initial Study Checklist</u>: This section contains the completed Appendix G Initial Study Checklist included in the State CEQA Guidelines.

<u>Environmental Impact Analysis</u>: Each environmental issue identified in the Initial Study Checklist contains an assessment and discussion of impacts associated with each subject area.

PROJECT DESCRIPTION

ENVIRONMENTAL SETTING

Project Location

The Project Area includes all lots within the boundaries of the Central City West Specific Plan. The Central City West Specific Plan Area (SPA) is located immediately west of Downtown Los Angeles as shown in Figure 1, comprising of approximately 491 acres bounded generally by the Hollywood Freeway (US-101) on the north, the Harbor Freeway (SR-110) on the east, Olympic Boulevard on the south, and on the west by Glendale Boulevard and Union Avenue.

The majority of the lots within the SPA are designated for commercial and multiple-family residential uses with some lots designated for public facilities and open space uses. The proposed ordinance amending the affordable housing requirements of the Central City West Specific Plan would apply to all multiple-family residential or mixed use developments consisting of 11 dwelling units or more with the SPA.

PROPOSED PROJECT

Project Background

The Central City West Specific Plan (Specific Plan) was adopted on February 20, 1991, under Ordinance No. 166,703 and subsequently amended five times, with the most recent amendment made in 2009. Since the adoption of the Specific Plan amendment, several developments have been subject to the affordable housing provisions. However, in 2009, in *Palmer/Sixth Street Properties, L.P. v. City of Los Angeles* (Palmer), the Second District Court of Appeal held that the Specific Plan's affordable housing provisions, specifically its Inclusionary Housing provisions for rental units, were preempted by the State Costa-Hawkins Rental Housing Act. Since the 2009 *Palmer* decision, the City has treated the Specific Plan's Inclusionary Housing requirement for residential units as unenforceable and projects have been processed in accordance with the *Palmer* decision.

Since the *Palmer* decision, State laws and City ordinances have been adopted to facilitate the development of affordable housing units. The most recent State law, Assembly Bill (AB) 1505, which became effective January 1, 2018, explicitly mentions *Palmer/Sixth Street Properties*, *L.P. v. City of Los Angeles* and declared its intent to supersede the *Palmer* decision. With the passage of AB1505, local jurisdictions have authority to impose inclusionary housing ordinances.

As a result of AB 1505, the City Council adopted a Motion on June 13, 2018, directing the Department of City Planning to prepare and present an ordinance amending the Central City West Specific Plan's affordable housing provisions in order to phase in the inclusionary housing requirement and to prepare other revisions to the Specific Plan's affordable housing provisions that make them more consistent with current affordable housing laws.

Project Description

The Proposed Project would modify the affordable housing requirements of the Central City West Specific Plan (Specific Plan). The Proposed Project, by itself, does not propose or authorize any development. The affordable housing requirements are triggered when the proposed development is a multiple-family residential or mixed use project consisting of 11 dwelling units or more. The proposed modifications to the Specific Plan's existing affordable housing requirements would better align the requirements with changes to State and City regulations that were adopted subsequent to the adoption of the Specific Plan which similarly aim to encourage affordable housing within multiple-family residential and mixed use projects. Since the Specific Plan's adoption in 1991, several regulations, including, but not limited to, the State Density Bonus Implementation Ordinance; the City Density Bonus laws, the Affordable Housing Linkage Fee Ordinance, the Transit Oriented Communities Affordable Housing Incentive Program (TOC); and Measure JJJ, require and/or create incentives for development projects to provide a certain percentage of dwelling units as affordable dwelling units or pay fees. Future development projects consisting of 11 or more dwelling units will be required to comply with these revised provisions. The proposed ordinance includes the following changes:

- Modifying how affordable dwelling units are calculated;
- Including additional income categories as an option to comply with the Inclusionary Housing provision;
- Replacing the Specific Plan's "Housing Linkage fee" and the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance; and
- Phasing the implementation of the modified housing requirements.

Central City West Specific Plan

Figure 1: Project Area

Map No. 1

Specific Plan Area

Paparel ty City of Los Angele Planzing Department - Craphs: Service Section - July, 2000

CITY OF LOS ANGELES

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

NEGATIVE DECLARATION

LEAD CITY AGENCY:
City of Los Angeles
CD 1 - Gil Cedillo and 13 - Mitch O'Farrell

PROJECT TITLE:
Central City West Specific Plan Amendment
CPC-2018-5222-SP

PROJECT LOCATION: Central City West Specific Plan area. The Specific Plan Area (SPA) is located immediately west of Downtown Los Angeles as shown in Figure 1, comprising of 491 acres bounded generally by the Hollywood Freeway (US-101) on the north, the Harbor Freeway (SR-110) on the east, Olympic Boulevard on the south, and on the west by Glendale Boulevard and Union Avenue.

PROJECT DESCRIPTION: The Proposed Project would modify the affordable housing requirements of the Central City West Specific Plan (Specific Plan). The Proposed Project, by itself, does not propose or authorize any development. The existing affordable housing requirements are triggered when the proposed development is a multiple-family residential or mixed use project consisting of 11 dwelling units or more. The proposed modifications to the Specific Plan's existing affordable housing requirements would better align the requirements with changes to State and City regulations that were adopted subsequent to the adoption of the Specific Plan which similarly aim to encourage affordable housing within multiple-family residential and mixed use projects. Since the Specific Plan's adoption in 1991, several regulations, including, but not limited to, the State Density Bonus Implementation Ordinance; the City Density Bonus laws, the Affordable Housing Linkage Fee Ordinance, the Transit Oriented Communities Affordable Housing Incentive Program (TOC); and Measure JJJ, require and/or create incentives for development projects to provide a certain percentage of dwelling units as affordable dwelling units or pay fees. Future development projects consisting of 11 or more dwelling units will be required to comply with these revised provisions. The proposed ordinance includes the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the removal of the Specific Plan's "Housing Linkage fee" and replacing the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance: and phasing of the implementation of the modified housing requirements.

FINDING: The Department of City Planning of the City of Los Angeles finds that the proposed Project WILL NOT have a significant effect on the environment, an ENVIRONMENTAL IMPACT REPORT is NOT required. The INITIAL STUDY/NEGATIVE DECLARATION prepared for this project is attached.

NAME OF PERSON PREPARING THIS FORM Giselle Joyce B. Corella	TITLE City Planning Associate	TELEPHONE NUMBER (213) 978-1357
ADDRESS Community Planning 200 North Spring Street, Room 667 Los Angeles, CA 90012	SIGNATURE (Official)	11/2/2018

CITY OF LOS ANGELES

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

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

| COUNCIL | DATE: | City of Los Angeles | DISTRICT: | 1 - Gil Cedillo | 13 - Mitch O'Farrell | | COUNCIL | DISTRICT: | Council | Council

PREVIOUS ACTIONS CASE NO.: N/A

PROJECT DESCRIPTION: CENTRAL CITY WEST SPECIFIC PLAN AMENDMENT

ENV PROJECT DESCRIPTION: The Proposed Project would modify the affordable housing requirements of the Central City West Specific Plan (Specific Plan). The Proposed Project, by itself, does not propose or authorize any development. The existing affordable housing requirements are triggered when the proposed development is a multiplefamily residential or mixed use project consisting of 11 dwelling units or more. The proposed modifications to the Specific Plan's existing affordable housing requirements would better align the requirements with changes to State and City regulations that were adopted subsequent to the adoption of the Specific Plan which similarly aim to encourage affordable housing within multiple-family residential and mixed use projects. Since the Specific Plan's adoption in 1991, several regulations, including, but not limited to, the State Density Bonus Implementation Ordinance; the City Density Bonus laws, the Affordable Housing Linkage Fee Ordinance, the Transit Oriented Communities Affordable Housing Incentive Program (TOC); and Measure JJJ, require and/or create incentives for development projects to provide a certain percentage of dwelling units as affordable dwelling units or pay fees. Future development projects consisting of 11 or more dwelling units will be required to comply with these revised provisions. The proposed ordinance includes the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the replacement of the Specific Plan's "Housing Linkage fee" and the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance, and phasing of the implementation of the modified housing requirements.

ENVIRONMENTAL SETTING: The Specific Plan area is an urban environment located adjacent to downtown Los Angeles. A majority of lots are zoned multiple-family residential, commercial and mixed-uses and is one of the densest areas in the City. There are also several lots developed with public uses including schools and open spaces such as the Vista Hermosa 10.5 acre urban natural park.

PROJECT LOCATION: Central City West Specific Plan area. The Specific Plan Area (SPA) is located immediately west of Downtown Los Angeles as shown in Figure 1, comprising of 491 acres bounded generally by the Hollywood Freeway (US-101) on the north, the Harbor Freeway (SR-110) on the east, Olympic Boulevard on the south, and on the west by Glendale Boulevard and Union Avenue.

COMMUNITY PLAN AREAS: Westlake and Silver Lake- Echo Park- Elysian Valley STATUSES: ☐ Preliminary ☑ Does Conform to Plan ☐ Proposed ☐ Does NOT Conform to Plan ☑ ADOPTED	AREA PLANNING COMMISSION: Central	CERTIFIED NEIGHBORHOOD COUNCIL: Greater Echo Park Elysian, Downtown Los Angeles, Westlake North, and Westlake South
EXISTING ZONING: R4(CW), R5(CW), RC4(CW), RC5(CW), C1(CW), C2(CW),C4(CW), CM(CW), OS(CW), and PF(CW) GENERAL PLAN LAND USE: High Density Residential, High Medium Residential, Medium Residential, Regional Center Commercial, Highway Oriented Commercial, Highway Oriented Commercial – High Medium Residential, Community Commercial – Mixed High Residential, Limited Commercial – Mixed Medium Residential, Community Commercial, General Commercial, Neighborhood Commercial, Limited Commercial, Commercial Manufacturing, Public Facilities, and Open Space.	MAX DENSITY ALLOWED BY ZONING: n/a MAX DENSITY ALLOWED BY PLAN DESIGNATION: n/a	LA RIVER ADJACENT: No

DETERMINATION (To be completed by the Lead Agency)

On	the basis of this initial evaluation:
	I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed Project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the 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.
9	City Planning Associate (213) 978-1357 Signature Title Phone

INITIAL STUDY CHECKLIST

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 onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "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 Analyses," as described in (5) below, may be cross-referenced).
- 5. Earlier analyses may 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 source 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 whatever 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 one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ AESTHETICS	☐ GREENHOUSE GAS EMISSIONS	☐ POPULATION AND HOUSING
☐ AGRICULTURE AND FOREST	☐ HAZARDS AND HAZARDOUS	☐ PUBLIC SERVICES
RESOURCES	MATERIALS	☐ RECREATION
☐ AIR QUALITY	☐ HYDROLOGY AND WATER	☐ TRANSPORTATION AND TRAFFIC
☐ BIOLOGICAL RESOURCES	QUALITY	☐ TRIBAL CULTURAL RESOURCES
☐ CULTURAL RESOURCES	☐ LAND USE AND PLANNING	☐ UTILITIES
☐ GEOLOGY AND SOILS	☐ MINERAL RESOURCES	☐ MANDATORY FINDINGS OF
	□NOISE	SIGNIFICANCE
INITIAL STUDY CHEC	CKLIST BACKGROUND (To be completed	by the Lead City Agency)
PROPONENT NAME:	PHONE NUMBER	₹:
City of Los Angeles Department of City Pl	anning (213) 978-1357	
APPLICANT ADDRESS:		
200 N Spring St., Room 667		
Los Angeles, CA 90012		
ACENOV DECLUDING CUECKLICE		
AGENCY REQUIRING CHECKLIST:		
Department of City of Los Angeles		
	DATE:	
Department of City of Los Angeles		

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
I. AE	STHETICS				-
Would	the project:				
a.	Have a substantial adverse effect on a scenic vista?				\boxtimes
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?			\boxtimes	
C.	Substantially degrade the existing visual character or quality of the site and its surroundings?				\boxtimes
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				\boxtimes
II. AG	RICULTURE AND FOREST RESOURCES				
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?				\boxtimes
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				\boxtimes
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use?				\boxtimes
III. A	R QUALITY				
Would	the project:				
a.	Conflict with or obstruct implementation of the SCAQMD or congestion management plan?				\boxtimes
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				\boxtimes
C.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?				
d.	Expose sensitive receptors to substantial pollutant concentrations?				\boxtimes
e.	Create objectionable odors affecting a substantial number of people?			\boxtimes	

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
IV. E	BIOLOGICAL RESOURCES				
Wou	ld 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 Wildlife 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 Wildlife 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?			\boxtimes	
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?				
V. C	ULTURAL RESOURCES				
Would	I the project:				
а.	Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5?				
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5?				
C.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				\boxtimes
d.	Disturb any human remains, including those interred outside of formal cemeteries?				\boxtimes
VI. G	EOLOGY AND SOILS				
Wou	ld the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to division of mines and geology special publication 42.				
ii.	Strong seismic ground shaking?				
iii.	Seismic-related ground failure, including liquefaction?				
iv.	Landslides?				
b.	Result in substantial soil erosion or the loss of topsoil?				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
C.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in onor off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				\boxtimes
d.	Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property?				\boxtimes
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
VII. C	GREENHOUSE GAS EMISSIONS				
Woul	d 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?				
VIII. i	HAZARDS AND HAZARDOUS MATERIALS				
Woul	d the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				\boxtimes
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?			\boxtimes	
C.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			\boxtimes	
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?				
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				\boxtimes

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
IX. H	HYDROLOGY AND WATER QUALITY	paret	oo.poi.a.ou		poiot
	Id the project:				
a.	Violate any water quality standards or waste discharge requirements?				\boxtimes
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?				
C.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or 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?			\boxtimes	
g.	Place housing within a 100-year flood plain as mapped on federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map?			\boxtimes	
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?			\boxtimes	
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?				\boxtimes
j.	Inundation by seiche, tsunami, or mudflow?				\boxtimes
X. LA	AND USE AND PLANNING		•		
Woul	ld the project:				
a.	Physically divide an established community?				\boxtimes
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				\boxtimes
C.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				\boxtimes
XI. M	IINERAL RESOURCES				
Woul	ld the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				
b.	Result in the loss of availability of a locally–important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				

		Potentially Significant	Less Than Significant with Mitigation	Less than Significant	No
		Impact	Incorporated	Impact	Impact
XII. N	IOISE		•		
Wou	d the project result in:				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?				\boxtimes
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?			\boxtimes	
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?				\boxtimes
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?				\boxtimes
XIII.	POPULATION AND HOUSING				
Wou	d the project:				
a.	Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?				
C.	Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?				
XIV.	PUBLIC SERVICES				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i.	Fire protection?			\boxtimes	
ii.	Police protection?			\boxtimes	
iii.	Schools?			\boxtimes	
iv.	Parks?			\boxtimes	
V.	Other public facilities?			\boxtimes	
XV. I	RECREATION				l
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?			\boxtimes	
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?			\boxtimes	

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVI.	TRANSPORTATION AND TRAFFIC				
Woul	d 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 nonmotorized 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 county congestion management agency for designated roads or highways?				
C.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e.	Result in inadequate emergency access?				\boxtimes
f.	Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				\boxtimes
XVII.	TRIBAL CULTURAL RESOURCES				
section	ld the project cause a substantial adverse change in the significance of a tr on 21074 as either a site, feature, place, cultural landscape that is geog scape, sacred place, or object with cultural value to a California Native Am	raphically defii	ned in terms of the	Public Resource size and scope	s Code e of the
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				\boxtimes
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
XVI	I. UTILITIES & SERVICE SYSTEMS	•			
Woul	d the project:				
a.	Exceed wastewater treatment requirements of the applicable regional water quality control board?				
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
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 resource, or are new or expanded entitlements needed?			\boxtimes	
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?			\boxtimes	
g.	Comply with federal, state, and local statutes and regulations related to solid waste?			\boxtimes	
XIX.	MANDATORY FINDINGS OF SIGNIFICANCE				
а.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below selfsustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).				
C.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?			\boxtimes	

DISCUSSION OF THE ENVIRONMENTAL EVALUATION

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, Geology, etc.). Impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated below field investigation of the Project Area, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the City's Project Description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with CEQA and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts.

The proposed Project as identified in the Project Description will not cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report is not necessary.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in Room 750, City Hall, 200 N Spring Street.

<u>For City information, addresses, and phone numbers</u>: visit the City's websites at: http://www.lacity.org; and City Planning and Zoning Information Mapping Automated System (ZIMAS) at http://www.cityplanning.lacity.org/.

Engineering/Infrastructure/Topographic Maps/Parcel Information is available at: http://boemaps.eng.ci.la.ca.us/index0.1htm, or City's main website under the heading "Navigate LA."

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ENVIRONMENTAL IMPACT ANALYSIS

INTRODUCTION

This section of the Initial Study/ Negative Declaration (IS/ND) contains an assessment and discussion of impacts associated with each environmental issue and subject area identified in the Initial Study Checklist.

IMPACT ANALYSIS

_			Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	AES	STHETICS				
Wo	uld th a)	e project: Have a substantial adverse effect on a scenic vista?				V
	b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			V	
	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 pighttime views in the area?				V

a) No Impact. A scenic vista is generally defined as a public view of highly valued visual and scenic resources exhibiting a unique or unusual feature, such as mountains, hillsides, bodies of water and/or urban skylines. A scenic vista may also be a particular distant view that provides visual relief from less attractive nearby features. Designated federal and state lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape. Examples of local scenic views include public views of the Pacific Ocean and the Santa Monica Mountains.

The Project Area is located within the context of an urbanized area, adjacent to Downtown Los Angeles. In general, the Project Area is developed with commercial, multiple-family residential, manufacturing, public facilities and open space uses.

The purpose of the Project is to modify the Specific Plan's affordable housing provisions to better align its regulations with State and City regulations.

The Project would have no impact on a scenic vista as it does not authorize or propose any development. The Project modifies the existing affordable housing provisions to better align with recently adopted changes to State and City regulations. Overall, the densities and intensities of future development remain the same as no changes to density, height or floor area ratios (FAR) area proposed. Currently, the existing affordable housing provisions require a multiple-family residential or mixed use development project consisting of 11 dwelling units or more, to replace on a one-for-one basis, Low and Very Low Income Dwelling Units and/or guest rooms demolished; or reserve 15% of the dwelling units for Low Income¹ households, whichever results in the greater number of affordable dwelling units.

¹ Persons or families whose annual income does not exceed 80% of the median annual income for persons or families residing in the Los Angeles Standard Metropolitan Statistical Area. Median annual income shall be determined and published periodically by the Federal Department of Housing and Urban Development.

The addition of the Very Low² and Extremely Low³ income categories does not increase the density or intensity of a proposed development project because it does not authorize increases in density or floor area. Therefore, the Project would have no impact as it would not block or otherwise impede an existing public view of a scenic vista.

- b) Less Than Significant Impact. A designated state scenic highway generally consists of a scenic corridor that is comprised of memorable landscape that showcases the natural scenic beauty or agriculture of California with minimal visual intrusions. The Project Area is located near the designated state scenic highway, Arroyo Seco Historic Parkway (SR-110), but is outside the SPA boundaries. As mentioned above, the Project does not propose any development or ground disturbing activity. Additionally, there is no basis to find the proposed amendments will indirectly result in different development patterns or building types. The proposed amendments will bring the Specific Plan into alignment with existing local and State laws. Thus, less than significant impact would occur to scenic resources within a state scenic highway.
- c) No Impact. Significant impacts to the visual character of a site and its surroundings are generally based on the removal of features with aesthetic value, the introduction of contrasting urban features into a local area, and the degree to which the elements of the proposed Project detract from the visual character of an area.

The Project is modifying the Specific Plan's existing affordable housing provisions, it does not propose or authorize development. The Project is not anticipated to induce construction of new residential or mixed-use development as it does not incentivize or provide concessions for providing affordable housing.

The modifications to the affordable housing provisions would not alter the visual character or quality of the site and its surroundings. Additionally, new residential or mixed-use developments would still be subject to the Specific Plan's Urban Design Guidelines. There is no impact, no further analysis is required.

d) No Impact. Light impacts are typically associated with the use of artificial light during the evening and night-time hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective building cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Project would modify the affordable housing provisions for mixed-use or residential development projects located in commercial, multiple-family and mixed-use zones. The Project Area is generally made-up of commercial, mixed-use, and multiple-family uses with existing levels of ambient nighttime lighting, including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights.

² A dwelling unit which is rented or sold to and occupied by "Very Low Income Households" as defined in Section 50105 of the Health and Safety Code.

³ A dwelling unit which is rented or sold to and occupied by "Extremely Low Income Households" as defined in Section 50106 of the Health and Safety Code.

Development will continue to occur in the Project Area including demolition and modifications to existing structures and new development. These uses either are currently producing some light (as in the case of existing commercial, multiple-family residential and mixed-use buildings) or would generally be located in areas that are developed and well lit. Further, residential and mixed-uses would not be expected to emit large amounts of nighttime lighting or glare as all development projects are required to comply with provisions of the LAMC in this regard. There would be no impacts and no further analysis is required. Less Than

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AG	RICULTURE AND FORESTRY RESOURCES				
Would t	he project:				
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				V
b)	Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				V
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)?				V
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				\checkmark
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				V

- a) No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Area is not included in the Important Farmland category⁴. Furthermore, no parcels located in the Project Area are categorized as significant farmland. The proposed Project would only apply to proposed residential or mixed use developments on lots zoned R4(CW), R5(CW), RC4(CW), RC5(CW), C1(CW), C2(CW), C4(CW), and CM(CW) and would not apply to sites zoned for agricultural use. Therefore, implementation of the proposed Project would not convert farmland to non-agricultural use. No impacts would occur, and no further analysis is required.
- b) No Impact. As mentioned above, the Project Area does not include lots zoned for agricultural use. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. The proposed Project applies only to properties zoned for commercial, residential, or mixed-use uses. Accordingly, the Project Area does not contain any lands covered by a Williamson Act contract. Therefore, the proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. No impacts would occur and no further analysis is required.

⁴ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County 2014 Important Farmland Map, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, accessed August 6, 2018.

- c) No Impact. The Project Area generally consists of commercial, multiple-family residential, mixed-use, manufacturing, public facilities and open space uses with properties zoned R4(CW), R5(CW), RC4(CW), RC5(CW), C1(CW), C2(CW), C4(CW), CM(CW), OS(CW), and PF(CW) in the Westlake and Silverlake-Echo Park-Elysian Valley Community Plan Areas. The Project Area and the surrounding areas do not contain any forest land or land zoned for timberland production⁵. The proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. No impacts would occur and no further analysis is required.
- d) No Impact. See response to Section II (c) above. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits." Timberland is defined as "land... which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees." A variety of street trees are located throughout the Project Area, along the parkways adjacent to residential, commercial, and private property, but are largely ornamental. There is no forest land or timberland in the Project Area. No impacts would occur and no further analysis is required.
- e) **No Impact.** See responses to Sections 2 (a) through (d) above. The Project, by itself, does not propose or authorize development and only proposes to modify the affordable housing requirements of the Specific Plan. No changes of land use or zoning is proposed, therefore, no impacts would occur that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, no further analysis is required.

III AII	R QUALITY	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VVould (a)	he project: Conflict with or obstruct implementation of the applicable air quality plan?				V
b)	Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?				V
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)?				V
d)	Expose sensitive receptors to substantial pollutant concentrations?				V
e)	Create objectionable odors affecting a substantial number of people?			V	

a-d) No Impact. The City of Los Angeles is entirely within the South Coast Air Basin (SCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the SCAQMD. The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while

⁵ City of Los Angeles General Plan, Conservation Element, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 8, 2018.

⁶ California Public Resources Code Section 12220[g]

⁷ California Public Resources Code Section 4526

accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG).

The Project modifies the affordable housing provisions of mixed-use and multiple-family residential developments in the R4(CW), R5(CW), RC4(CW), RC5(CW), C1(CW), C2(CW), C4(CW), and CM(CW) zones to expand options for compliance with the inclusionary housing provisions. The Project by itself, does not propose or authorize development nor does it authorize or expand any new or existing land uses. All proposed development projects located within the Project Area are reviewed under the Department of City Planning's Specific Plan discretionary review process and would be subject to their own environmental review.

The Project modifies the affordable housing provisions to streamline some of its provisions to be more consistent with State Density Bonus Law and other City ordinances. It is possible that new residential and mixed-use developments will be constructed as a result of the Project, due to the fact that there are no zoning changes proposed new construction is not expected to exceed levels that would occur under existing zoning. Additionally, new construction of residential and mixed-use developments are expected to be consistent with the same pace as development projects participating in State Density Bonus Law or other similar City ordinance offering incentives or concessions for the construction of affordable housing. The Project is not anticipated to significantly induce construction or otherwise alter development patterns in the area or the City, therefore, it is not reasonably foreseeable that modifying the affordable housing provisions will cause additional impacts to air quality as no development or construction is proposed. Since the Project Area is located in an urbanized environment with existing residential, mixed-use, and commercial buildings, traffic impacts would have already been included in the AQMP. Therefore, the Project does not conflict with the applicable air quality plan, violate any air quality standard or contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under federal or state ambient air quality standard. Further, the Project would not expose sensitive receptors to substantial pollutant concentrations. No impacts would occur.

e) Less Than Significant Impact. According to the SCAQMD, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding⁸.

The proposed Project, by itself, would not authorize or propose any development. The implementation of the proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be due to construction activities and would be typical of most construction sites. Additionally, the odors from the construction of individual development projects would be temporary and the construction activity would be required to comply with SCAQMD Rule 4029. A less than significant impact relative to an odor nuisance would occur during construction activities associated with future development.

⁸ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning; http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4, August 10, 2018.

⁹ SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

Less Than

			Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.		LOGICAL RESOURCES				
VVou	a)	e project: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				V
	b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				V
	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?				V
	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?				V
	e)	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?			V	
	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?				V

a) No Impact. Habitats are natural and/or artificial environments that support the survival of wild animals and native plants. Five habitat types have been identified by the City¹⁰. These habitat types include Inland habitats, Significant Ecological Areas (SEA), Wildlife Corridors, Ocean, and Coastal Wetlands.

The Project Area is located in an urbanized setting and is southeast of Griffith Park, which is identified as a Significant Ecological Area in the City's General Plan Conservation and Open Space Element. With the potential exception of native trees protected by LAMC Ordinance No. 177,404, the proposed Project does not propose or authorize any new development in the habitat areas identified above, or expand any new or existing allowable land uses. Further, activities that occur pursuant to the proposed Project would only be permitted on residential, mixed-use, and commercial zoned lots. As such, the proposed Project would not directly affect any special status species and would not modify any special status species habitat.

Species expected to occur within the Project Area would be limited to terrestrial species (such as squirrel, opossum, or gopher) and birds that are commonly found in, and are tolerant of, urban environments. Therefore, the proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. No impacts would occur and no further analysis is required.

Central City West Specific Plan Amendment

¹⁰ City of Los Angeles General Plan, Conservation Element, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 7, 2018.

- b) No Impact. No riparian habitat or other sensitive natural community exists within the Project Area¹¹. Thus, implementation of the proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. Therefore, no impacts would occur and no further analysis is required.
- c) No Impact. As discussed in Section IV (b), there are no wetlands located within the Project Area. A significant impact would occur if federally protected wetlands would be modified or removed by a project. The proposed Project, by itself, does not propose or authorize any development and therefore would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur and no further analysis is required.
- d) No Impact. Wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those areas. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located within the Project Area. However, a number of mature trees are scattered within the Project Area and may provide suitable habitat, including nesting habitat, for migratory birds.

The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, selling, purchasing, and bartering of any migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA.

Construction activities that occur pursuant to the proposed Project would occur on lots zoned for residential, mixed-use, and commercial uses and would be required to comply with the provisions of the MBTA. The Project itself does not propose or authorize development and as discussed above is not expected to induce development or otherwise alter existing development or development patterns, therefore, no impacts would occur and no further analysis is required.

e) Less Than Significant Impact. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), defines protected trees as:

Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree:

- Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (Quercus dumosa);
- Southern California Black Walnut (Juglans californica var. californica);
- Western Sycamore (Platanus racemosa): and
- California Bay (Umbellularia californica).

There are a number of trees located along roadways and on private property within the Project Area that may potentially meet the requirements of the City's Protected Tree Ordinance. The Project by itself does not propose or authorize any development and as

¹¹ US Fish and Wildlife Service National Wetlands Inventory, Wetlands Data Mapper, https://www.fws.gov/wetlands/data/Mapper.html, accessed August 7, 2018.

discussed above is not expected to induce development or otherwise alter existing development or development patterns. Construction activities that occur pursuant to the Project would be required to comply with the City's Protected Tree Ordinance.

Additionally, there is a proposed code amendment (Planning Case file number: CPC-2016-4520-CA) to include native shrub species in the definition of "Protected Tree" which would additionally include the Mexican Elderberry (Sambucus Mexicana) and Toyon (Heteromeles arbutifolia) as a "Protected Tree." Although the proposed code amendment has not been adopted, any subsequent code amendments to include additional Protected Trees would also be considered, thus, compliance with the City's Protected Tree Ordinance would ensure that impacts to protected trees would be less than significant and no further analysis is required.

f) No Impact. The City does not have any adopted Habitat Conservation Plans.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	LTURAL RESOURCES				
vvould tr a)	ne project: Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?				V
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?				\checkmark
c)	Directly or indirectly destroy a unique paleontological resource or site of unique geologic feature?				V
d)	Disturb any human remains, including those interred outside of formal cemeteries?				V

a) No Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment ¹². Section 15064.5 of the State CEQA Guidelines defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A list of Historic Resources (based on State Office of Historic Preservation Criteria) is included in the Specific Plan's Appendix A. Additional resources may be included in SurveyLA.

Under the City's Cultural Heritage Ordinance local buildings and sites that meet the criteria for designation can be declared "Historic-Cultural Monuments" (HCMs) by the City Council after recommendation from the Cultural Heritage Commission. Additionally, the City has a Historic Preservation Overlay Zones (HPOZs) Program (commonly known as historic districts) to provide for review of proposed exterior alterations and additions to historic properties within designated districts. The City has adopted HPOZs for various

¹² California Public Resources Code Section 21084.1

neighborhoods citywide, however, no HPOZs are located within the Project Area boundaries¹³.

There are several HCMs located within the Project Area, including the Bob Baker Marionette Theater; a complete list of the HCMs are shown in Table 1, Historic Cultural Monuments in the Project Area. Any future projects proposed on sites which contain a designated a HCM would need to comply with the HCM regulations, processes and procedures for any demolitions, alterations, and/or additions to the building in addition to complying with the regulations of the Specific Plan and other applicable ordinances and provisions of the Los Angeles Municipal Code (LAMC). The Project by itself, does not include any proposed development or modifications to any existing structures and as discussed above is not expected to induce development or otherwise alter existing development or development patterns. The proposed amendment is limited to the affordable housing provisions of the Specific Plan and does not change the allowable height, density, FAR, or existing zoning. As such, there is no potential for historical resources to be affected by the proposed Project. Therefore, impacts to historical resources would be less than significant. No further analysis is required.

Table 1: Historic Cultural Monuments within the Project Area

Table II III da a a a a a a a a a a a a a a a	
Historic Cultural Monument Name	Site Address
Bob Baker Marionette Theater	1345 West 1st Street
Belmont Tunnel/ Toluca Substation and Yard	1304 West 2 nd Street
Los Angeles Nurses Club	245 South Lucas Avenue and
	1405 Miramar Street
Residence	1425 Miramar Street
Residence	757-767 Garland Avenue
David J. Witmer Family Houses and Compound	1422 West 2 nd Street and
	208-210 1/2 Witmer Street
Commodore Regency Apartments	1203-05 West 7 th Street and
	685 South Lucas Street
Arroyo Seco Parkway Historic District	CA 110 from 4 – Level interchange in Los Angeles to East
	Glenarm Street in Pasadena

b) No Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

Development in the Project Area would continue to be subject to the numerous laws and regulations that require state, and local agencies to consider the effects of a development project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Construction personnel shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

¹³ Department of City Planning Office of Historic Preservation, http://preservation.lacity.org/, accessed August 7, 2018.

The Project does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns. The proposed modifications to the Specific Plan's affordable housing provisions only pertain to the amount of affordable housing required for residential and mixed use projects and does not otherwise change the underlying zoning. Thus, compliance with the aforementioned regulatory measures would ensure that impacts to archaeological resources would be on an individual development project basis. No impact would occur as a result of the Project, no further analysis is required.

c) No Impact. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

All development projects would be subject to the numerous laws and regulations that require state, and local agencies to consider the effects of a proposed project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining appropriate actions where potentially significant impacts may occur. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines.

The Project itself, does not propose authorize development and is not expected to induce development or otherwise alter existing development or development patterns, however, future construction of residential or mixed-use development projects would need to comply with the regulatory measures described above. No impact would occur as a result of the implementation of the proposed Project and no further analysis is required.

d) No Impact. The proposed Project modifies the affordable housing provisions of the Specific Plan. Currently, all residential or mixed-use development projects need to restrict 15 percent of a project's housing units as Low Income housing units. The proposed Project would include additional income categories and set-aside percentages instead of the single option of 15 percent restricted Low Income housing units. The Project by itself, does not include any proposed development or modifications to any existing structures and is not expected to induce development or otherwise alter existing development or development patterns. The proposed amendment is limited to the affordable housing provisions of the Specific Plan and does not change the allowable height, density, FAR, or existing zoning.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e).

Pursuant to these codes, in the event that human remains are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into 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 is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. As the Project itself does not propose or authorize development, no impact would occur and no further analysis is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GE	OLOGY AND SOILS				
Would th	e project:				
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				V
	i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to division of Mines and Geology Special Publication 42.				☑
	ii. Strong seismic ground shaking?				\checkmark
	iii. Seismic-related ground failure, including liquefaction?				\checkmark
	iv. Landslides?				V
b)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving: Result in substantial soil erosion or the loss of topsoil?				V
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				V
d)	Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				V
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				V

- a) i) No Impact. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. These zones, which extend from 200 to 500 feet on each side of known active faults, identify areas where potential surface ruptures along active faults could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. No portion of the Project Area is located within the Alquist-Priolo Earthquake Fault Zone¹⁴. The Project by itself does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns so no ground rupture is expected to occur from the proposed ordinance. The Project would not change the existing built environment or the natural environment, or increase the risk of exposing people or structures to potential risks listed above, therefore, no impacts related to ground rupture would occur.
 - ii) No Impact. The Project Area is located within seismically active Southern California and therefore, could be subject to moderate and possibly strong ground motion due to earthquakes on the Upper Elysian Park fault, Puente Hills Blind Thrust fault, or Lower Elysian Park Thrust fault 15. The Project would modify the existing affordable housing requirements of the Specific Plan related to 1) the required restricted affordable housing units, 2) method of calculating affordable dwelling units, 3) the in-lieu fee structure, and 4) phase of the proposed modifications within the Project Area and is not expected to induce development or otherwise alter existing development or development patterns. All development in the Project Area would be required to comply with all relevant California Building Code (CBC)¹⁶ and the City of Los Angeles Uniform Building Code (UBC) seismic standards, and if necessary the preparation of a site-specific geotechnical investigation that would evaluate the potential for seismic risk and identify appropriate mitigation measures. Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels. Implementation of the proposed Project, by itself, does not trigger new development or construction and is not expected to induce development or otherwise alter existing development or development patterns, no impacts would occur so no further analysis is required.
 - iii) No Impact. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less. Portions of the Project Area are susceptible to liquefaction¹⁷ and thus may be susceptible to seismic-related ground failure such as lateral spreading, subsidence, or settlement. Construction activities that occur pursuant to the Project would be required to comply with current seismic design provision of the California Building Code and City's

¹⁴ City of Los Angeles General Plan, Safety Element, Exhibit A Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 7, 2018.

¹⁵ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 7, 2018.

¹⁶ The CBC is published every three years, with supplements published in intervening years. The building regulations and standards have the same force of law, and take effect 180 days after the publication unless otherwise noted. The California Building Standards Commission's mission is to produce sensible and usable state building standards.

¹⁷ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 7, 2017.

Building Code, which incorporates relevant provisions related to protection against liquefaction. Compliance with regulatory measures would ensure that potential impacts would be reduced to less than significant levels, additionally, the implementation of the proposed Project by itself does not trigger new development or construction and is not expected to induce development or otherwise alter existing development or development patterns, thus, no impacts would occur and so no further analysis is required.

iv) No Impact. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Area is located in a section of the City with hills and slopes, and is susceptible to landslides.

A number of the multiple-family residential, mixed-use, and commercial lots located in the Project Area are susceptible to landslides and a cluster of small shallow surface landslides ^{18,19}. In general, development in the Project Area is required to comply with all applicable regulations and design standards of the LAMC and the City's "Hillside" Development regulations, which sets specific building requirements beyond the CBC that relate directly to development of lots in designated "Hillside Areas." In addition, if deemed necessary by Department of Building and Safety, project applicants would be required to prepare a site-specific geotechnical investigation that would evaluate the potential for landslide risk and identify appropriate mitigation measures. Compliance with these regulatory measures would ensure that the Project would not create substantial geologic risk due to landslides. Impacts would be less than significant. Additionally, the implementation of the proposed Project by itself does not trigger new development or construction and is not expected to induce development or otherwise alter existing development or development patterns, thus, no impacts would occur and no further analysis is required.

b) No Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the Project Area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project Area is located in a section of the City with hills. Construction activities in designated "Hillside Areas" are subject to all applicable Best Management Practices (BMPs) relating to erosion and stormwater runoff and included in the City's Low Impact Development (LID) Ordinance (Ordinance No. 181899). LID is a stormwater management strategy that seeks to mitigate the impacts of runoff and stormwater pollution as close to its source as possible. LID comprises a set of site design approaches and BMPs that are designed to address runoff and pollution at the source. The proposed Project by itself does not propose or authorize development and is not expected to induce development or otherwise alter existing development or development patterns, thus, implementation of the Project would not result in substantial erosion or loss of topsoil, no impacts would occur and no further analysis is required.

¹⁸ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 7, 2017.

¹⁹ City of Los Angeles General Plan, Safety Element, Exhibit C Landslide Inventory & Hillside Areas in the City of Los Angeles, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 7, 2018.

- c) No Impact. As previously discussed in Section VI (iii) and (iv), much of the Project Area is susceptible to surface landslides and liquefaction. However, the Project does not propose or authorize development and would not authorize or expand any allowable land uses.
 - Any subsequent development that occurs pursuant to the Project would be designed and constructed in conformance with the CBC, as well as Los Angeles UBC requirements and other laws designed to protect site occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction or collapse would reduce potential impacts to less than significant levels, however, since no development project is proposed and is not expected to induce development or otherwise alter existing development or development patterns, no impacts would occur by adoption of the proposed amendments to the Specific Plan's affordable housing provisions. No further analysis is required.
- d) No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content and poor drainage. The ability of clayey soil to change volume can result in uplift or cracking to foundation elements or other rigid structures such as slabs-on-grade, rigid pavements, sidewalks, or other slabs or hardscape found on these soils. Compliance with existing laws, as required by the Los Angeles Department of Building and Safety (LADBS) would reduce potential impacts from expansive soils to less than significant levels, however, the proposed Project does not propose or authorize development and would not authorize or expand any new or allowable land uses and is therefore, not expected to induce development or otherwise alter existing development or development patterns, so no impacts would occur by adoption of the proposed Project. No further analysis is required.
- e) No Impact. The proposed Project does not propose or authorize any new development, and would not authorize or expand any allowable land uses. The proposed Project modifies the existing affordable housing requirements and therefore would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no further analysis is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GR	EENHOUSE GAS EMISSIONS				
Would th	ne project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			V	
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			V	

- **a-b)** Less Than Significant. Greenhouse gases (GHG) have been recognized to contribute to global climate change. Predicted effects of global climate change include sea level rise, water supply changes; changes to ecosystems and habitat; and human health effects. Until the passage of Assembly Bill (AB) 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. With the passage of AB 32, California is required to reduce its GHG emissions. Under AB 32 GHGs include:
 - Carbon dioxide (CO₂);

- Methane (CH₄);
- Nitrous oxide (N₂O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs);
- Sulfur hexafluoride (SF₆); and
- Nitrogen trifluoride (NF₃)²⁰

Carbon dioxide is the primary contributor to global climate change. As a result, GHG contributions are commonly quantified in the equivalent mass of CO₂, denoted as CO₂e. The transportation sector remains the substantial source of GHG emissions in California, with emission coming from the tailpipe of cars, trucks, off-road transportation sources, intrastate aviation, etc.. The residential and commercial sectors contribute a much smaller percentage of GHG emission in California compared to the transportation, industrial, electricity, and agriculture sectors. Greenhouse gas emissions from the commercial and residential sectors are dominated by the combustion of natural gas and other fuels for household use and for commercial businesses, such as space heating, cooking, and hot water or steam generation. Emissions from electricity used for cooling (air-conditioning) and appliance operation are already accounted for in the electricity sector²¹.

The Project would align the affordable housing requirements of the Specific Plan with the existing State and City regulations; it does not propose or authorize development. The proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development or development patterns.

The California legislature passed Senate Bill (SB) 375 (2008) to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS is contained in the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2012-2035 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in more opportunity for transit-oriented development. In addition, SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions that reduce vehicle miles traveled, which contribute to GHG emissions, as required by AB 32.

As mentioned, the Project does not propose or authorize development and is not expected to induce development or otherwise alter existing development or development patterns. Future development projects would be required to comply with all applicable plans, policies or regulations for purpose of reducing the emissions of greenhouse gases, therefore, less than significant impacts would occur.

²⁰ Nitrogen trifluoride was not listed initially in AB 32 but was subsequently added to the list via legislation.

²¹ 2018 Edition, California Greenhouse Gas Emission Inventory: 2000 – 2016, https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf, accessed September 11, 2018

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZ	ZARDS AND HAZARDOUS MATERIALS		-	-	
Would th a)	e project: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				V
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?			V	
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			V	
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?			V	
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?				V
f)	For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for the people residing or working in the area?				V
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				V
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?				V

a) No Impact. A significant impact would occur if the proposed Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project would not specifically result in the transport, use, and disposal of construction-related hazardous materials, as no specific development is proposed. Any future development under the Project would occur in conformance with all applicable local, state, and federal regulations governing such activities.

Operation of future residential or mixed-use development would require the use of common hazardous materials for cleaning purposes, landscaping, and routine maintenance. Examples of such materials could include cleaning solvents, fertilizers, pesticides, and herbicides for landscaping, and painting supplies. Such products would only be considered hazardous if used inappropriately or if exposed to unfavorable conditions. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and disposal of these materials would not pose a significant hazard to the public or the environment. As the proposed Project does not authorize development and would not authorize or expand any new or allowable land uses and is not expected to induce development or otherwise alter existing development or development patterns, no impacts related to the use of hazardous materials would occur. No further analysis is required.

- b) Less Than Significant Impact. Refer to Section VIII (a) above. Some existing structures within the Project Area that are demolished or renovated may contain lead-based paint (LBP) and/or asbestos containing materials (ACMs). If not properly abated, the demolition of these structures could accidently release hazardous materials, and the transport of these materials could create a public health risk. Construction activities would be required to comply with the SCAQMD Rule 1403 which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and renovation activities. California Code of Regulations (CCR) Title 8, Section 1532.1 et seg. requires that all LBPs be abated and removed by a licensed lead contractor. The Project does not authorize or propose any new development and is not expected to induce development or otherwise alter existing development or development patterns. Therefore, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Less than significant impacts would occur as the result of the Project. No further analysis is required.
- c) Less Than Significant Impact. There are several schools located within the Project Area. The Project does not authorize or propose any new development. As discussed in Section VII (a) above, any future development would generally include the use of those hazardous materials that are typically necessary for construction of residential, mixed-use or commercial development (e.g., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction activities would involve routine transport, use, and disposal of these types of hazardous materials. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities.

All potentially hazardous materials transported, stored, or used on individual project sites for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Future development would be required to comply with all federal, state and local standards and regulations. Therefore, the Project is not expected to adversely affect the existing schools in and around the Project Area. Impacts would be less than significant. No further analysis is required.

d) Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

A review of the Envirostor website showed that there are a few DTSC Cleanup Sites, one Leaking Underground Storage Tank (LUST) Cleanup site, but no DTSC Hazardous Waste Sites or^{22,23}.

²² GeoTracker Site/Facility Type Definitions, https://geotracker.waterboards.ca.gov/site_type_definitions, accessed August 8, 2018.

²³ These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively, accessed August 8, 2018.

It is considered unlikely that the Project would cause any impact causing a significant risk to the public. The Project does not propose or authorize any specific development projects, and only relates to the implementation of the modified affordable housing provisions, and is not expected to induce development or otherwise alter existing development or development patterns. The proposed amendment to the affordable housing provisions are limited to the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the removal of the Specific Plan's "Housing Linkage fee" and replacing the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance; and phasing implementation of the modified housing requirements. Thus, any future development that occurs in the Project Area would be required to comply with existing regulations related to hazardous materials. Accordingly, compliance with state and local laws and regulations would ensure impacts would be less than significant. No further analysis is required.

- e-f) **No Impact**. The Project Area is not located within an airport land use plan or within the vicinity of a public airport or private airstrip. Public airports closest to the Project Area is the Bob Hope Airport in the City of Burbank, Santa Monica Airport in the City of Santa Monica, and San Gabriel Valley Airport in the City of El Monte, all located approximately 15 miles from the center of the Project Area. The nearest private airstrip dedicated to noncommercial air travel is the Van Nuys airport, located approximately 20 miles to the north from the center of the Project Area. As no airports are in close proximity to the Project Area, no impact would occur. No further analysis is required.
- g) **No Impact**. Emergency services in the City are provided by the City of Los Angeles Fire Department (LAFD) and the City of Los Angeles Police Department (LAPD). Emergency incidents of a larger natural or manmade disaster require coordinated efforts between the LAFD, LAPD and the City's Emergency Operation Center (EOC). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments²⁴.

The Project Area is largely residential and commercial and includes City designated disaster routes²⁵. Implementation of the Project would not require or result in modifications to any of the roadways that would impact emergency traffic. The Project does not propose or authorize development and would not make changes to existing policies, programs, or regulations that address emergency response. Therefore, the Project would not physically interfere with any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan. No impacts would occur. No further analysis is required.

h) **No Impact.** The Project Area is located within a highly urbanized area. The Very High Fire Hazard Severity Zone comprises most of the hilly and mountainous regions of the City, and does not include the Project Area²⁶. The closest Very High Fire Hazard Severity Zone is just north of the Project Area around the Echo Park and Silverlake neighborhoods, generally

²⁴ Emergency Management Department, Emergency Operations Center, http://emergency.lacity.org/eoc, accessed August

²⁵ City of Los Angeles General Plan, Safety Element, Exhibit H Critical Facilities & Lifeline Systems in the City of Los Angeles, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 18, 2018.

²⁶ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 13, 2017.

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north of Sunset Boulevard approximately one mile away from the northern portion of the Project Area.

Additionally, Red Flag Restricted Areas are areas where illegally parked vehicles may be removed because they create hazardous conditions on Red Flag Days. These areas are identified to be very narrow roads, have hairpin turns, tight curves, and key intersections that, if not cleared of vehicles would create a choke point thereby delaying the ability for citizens to evacuate and limiting access by fire companies. The Project Area does not contain any Red Flag Restricted Areas²⁷. The Project, by itself, does not propose or authorize any development or authorize or expand any allowable land uses, therefore, the Project would not expose people or structures to a significant risk of loss, injury of death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

		Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No
IX. HY	DROLOGY AND WATER QUALITY	Impact	Incorporated	Impact	Impact
	ne project:				
a)	Violate any water quality standards or waste discharge requirements?				V
b)	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?			V	
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 onor off-site?			V	
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?			V	
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?			V	
f)	Otherwise substantially degrade water quality?			V	
g)	Place housing within a 100-year flood hazard area as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			V	
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			V	
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?				V
j)	Inundation by seiche, tsunami, or mudflow?				v

a) No Impact. A significant impact may occur if a development project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if

²⁷ NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 13, 2018.

a development project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB).

The Project by itself, does not authorize or expand any land uses so the Project does not include any point-source discharge (discharge of polluted water from a single point such as sewage-outflow pipe). Additionally, future development projects, when applicable, are required to comply with the City of Los Angeles Low Impact Development (LID) Ordinance No. 181,899²⁸ which is a stormwater management strategy and requirements of the City's Standard Urban Stormwater Mitigation Plan (SUSMP) to address stormwater pollution from new developments and redevelopment projects. Therefore, the Project would not result in an impact to water quality and waste discharge. No further analysis is required.

- b) Less Than Significant Impact. A significant impact would occur if the Project substantially depleted groundwater or interfered with groundwater recharge. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from four primary sources, including water supplied by the Metropolitan Water District (MWD) (From Five-Year Average, Fiscal Year 2012-2016 64 percent; Bay Delta 54 percent, Colorado River 10 percent), Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (20 percent), local groundwater (14 percent), and recycled water (2 percent)²⁹. Based on the City's most current Urban Water Management Plan (UWMP)³⁰, in 2011-2014 the LADWP had a total water demand of 566,990 acre-feet per year with approximately 165,364 acre-feet³¹ or 29% of the demand from multi-family and 98,994 acrefeet or 17% from commercial. The majority of lots within the Project Area are developed with multiple-family and commercial uses and would not be expected to substantially change surface area on the lot due to the Project which modifies the Specific Plan's existing affordable housing provisions. Therefore, impacts related to groundwater supplies would be less than significant. No further analysis is required.
- c) Less Than Significant Impact. Significant impact would occur if the Project substantially altered the drainage pattern of the Project Area or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. In general the Project Area is developed and built-out with multiple-family and commercial uses. There are no natural watercourses within the Project Area³².

As discussed in Section IX (a) above, development that occurs in the Project Area would be required to comply with all federal, state and local regulations regarding stormwater runoff, including the City's LID Ordinance and the City's UWMP Best Management Practices (BMPs). Compliance with these regulatory measures would reduce the amount of surface water runoff leaving the Project Area after a storm event. Therefore, development that occurs pursuant to the Project would result in a less than significant impact in relation to

²⁸ Ordinance No. 181,899, http://clkrep.lacity.org/onlinedocs/2009/09-1554 ord 181899.pdf, accessed August 14, 2018.

²⁹ Los Angeles Department of Water and Power - Water: Facts and Figures, Briefing Book 2017-2018, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrlstate= 18i8d8hpzl_21&_afrLoop=430938015435485, accessed August 14, 2018.

³⁰Los Angeles Department of Water and Power – 2015 Urban Water Management Plan, website: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp;jsessionid=xfbvbyzXCCdnN6nmkbznXJSp86hLJgvnrFB12bQLsdSrFSvSfyKT!- 1896400610?_afrLoop=3539752875125&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_a

frLoop%3D353937528751225%26_afrWindowMode%3D0%26_adf.ctrl-state%3D9enb0ard3_4, accessed August 14, 2018.

³¹ One acre foot equals 325,851 gallons of water.

³² NavigateLA, http://navigatela.lacity.org/navigatela/, accessed August 13, 2018.

surface water hydrology and would not result in substantial erosion or siltation on- or offsite. No further analysis is needed.

- d) Less Than Significant Impact. As discussed in Section IX (c) above, construction activities that occur pursuant to the Project are not anticipated to substantially change the drainage pattern of the Project Area. Future development would be required to comply with the BMPs included in the LID Ordinance and UWMP and would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. As such, impacts would be less than significant. No further analysis is required.
- e) Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated. For the purpose of this specific issue, a significant impact may occur if the volume of stormwater runoff from the Project Area were to increase to a level which exceeds the capacity of the storm drain system serving the individual project site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

The majority of lots located in the Project Area are developed with multiple-family dwellings and commercial structures. Should any construction activity occur within the Specific Plan Area, the construction activity would be confined to lots that are or were previously developed with those uses. Impacts to the existing stormwater drainage system in the Project Area would be less than significant.

The Project would modify the existing affordable housing provisions of the Specific Plan to the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the removal of the Specific Plan's "Housing Linkage fee" and replacing the Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance; and phasing of the implementation of the modified housing requirements. The Project, by itself, does not propose or authorize any development or authorize or expand any allowable land uses, and is not expected to induce development or otherwise alter existing development or development patterns, therefore, the Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant. No further analysis is needed.

- f) Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. As described above, the Project does not authorize or propose development and does not expand any allowable land uses. Specific measures to reduce the potential for water quality impacts would be evaluated on an individual development project basis. Therefore, no significant impact would occur. No further analysis is necessary.
- **g-h)** Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk.

A majority of the Project Area is in an area of minimal flood risk (Zone X)³³ as mapped by FEMA³⁴. Just outside a Special Flood Hazard Area, the northern portion of the Project Area is just south of the Echo Park Lake which is a 100-year flood hazard area contained in a channel.

To minimize impacts to properties located prone to flooding, the City adopted the Flood Hazard Management Specific Plan (Ordinance No. 172,081). The ordinance requires properties that are located in areas prone to flooding to undergo additional permit review and implement mitigation measures (as necessary). Therefore, as future development occurs in the Project Area in areas subject to flooding, projects would be required to comply with the Flood Hazard Management Plan and Ordinance No. 172,081. As the Project Area is not located within and in the immediate vicinity of a Special Flood Hazard Area, impacts would be less than significant. No further analysis is required.

i) No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

No parts of the Project Area are located within a potential inundation area³⁵. Seiches can occur in areas adjacent to water storage facilities. Inundation from a seiche can occur if a wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. LADWP regulates the level of water in its storage facilities and provides walls of extra height to contain seiches and prevent overflow. In addition, the LADWP monitors dams and reservoirs during storm events and implements mitigation measures to prevent potential overflow. No portion of the Project Area is subject to flooding as a result of inundation from water storage facilities. The Project does not include any development and only relates to the modification of the existing affordable housing requirements of the Specific Plan within the Project Area. Therefore, the Project would not expose people or structures to significant risk of injury. No impact would occur and no further analysis is necessary.

j) No Impact. See response to Section IX (i) above. A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its inland location, the Project Area is not susceptible to tsunamis³⁶. Impacts would be less than significant in this regard.

In addition, as discussed in Section IX (g) above, lots that are subject to mudflow and/or flooding would be required to comply with the City's Flood Hazard Management Specific

³³ Zone X: Areas determined to be outside the 500-year floodplain and outside the 1% and 0.2% annual chance floodplain.

³⁴ As per FEMA Flood Insurance Rate Map No. 06037C1620F and 06037C1610F effective as of 09/26/2008, accessed August 14, 2018. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.

³⁵ City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf., access August 14, 2018.

³⁶ City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf., access August 14, 2018.

Plan, including Ordinance No. 172,081. Thus, no impacts are anticipated to occur with regard to the inundation by seiche, tsunami, or mudflow. No further analysis of this issue is required.

			Less Than Significant		
		Potentially Significant Impact	with Mitigation Incorporated	Less Than Significant Impact	No Impact
	ND USE AND PLANNING e project:	-	-	-	
a)	Physically divide an established community?				V
b)	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				V
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?				V

a) No Impact. A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways which would divide established communities.

The adoption of the Specific Plan amendments are limited to the following changes: the method for calculating affordable dwelling units; the inclusion of additional income categories as an option to comply with the Specific Plan's Inclusionary Housing provision; the replacement of the Specific Plan's "Housing Linkage fee" and Specific Plan's "In Lieu Fee" with commensurate fees required by the Citywide Housing Linkage Fee Ordinance; and phasing implementation of the modified housing requirements. Therefore, no impact would occur.

b) No Impact. The Los Angeles City Council has adopted several ordinances that aim to facilitate the production of affordable housing. Some ordinances that have been adopted in the past years include the Citywide Affordable Housing Linkage Fee, the Transit Oriented Communities Affordable Housing Incentive Program (TOC), and Ordinance No. 184,745 implementing the recently passed Measure JJJ. Additionally, there continues to be updates to the State Density Bonus Law.

The proposed Project would make the Specific Plan's affordable housing requirements more consistent with the ordinances and policies described. Specifically, the Project would:

- 1. Include additional income categories of Extremely Low and Very Low similar to the income categories of TOC and Density Bonus;
- 2. Modify how the restricted affordable dwelling units are calculated to be consistent with the State Density Bonus Law;
- 3. Replace the Specific Plan fees with the Citywide Affordable Housing Linkage Fee; and
- 4. Phase implementation of the modified affordable housing provisions.

The proposed Project would remove any existing conflicts with any of the policies or regulations and facilitate the production of affordable housing. Additionally, the proposed Project would be consistent with the goals and objectives of the Westlake Community Plan,

Silver Lake - Echo Park - Elysian Valley Community Plan, and Central City West Specific Plan:

Westlake Community Plan: Objectives and Policies³⁷

- To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.
- To conserve and improve existing viable housing for persons desiring to live in Westlake, especially low and moderate income families.
- That the City shall support continued affordability of units subject to termination of Federal mortgage or rent subsidies and expiring bond projects.
- That the City shall discourage the demolition of affordable housing unless there is adequate assurance that suitable equivalent replacement units will be made available.

Silver Lake - Echo Park - Elysian Valley Community Plan: Objectives and Policies³⁸

- Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.
- Achieve and maintain a housing supply sufficient to meet the diverse economic and socioeconomic needs of current and projected population to the year 2010.
- Promote and ensure the provision of adequate housing for all persons, including special needs populations, regardless of income, age or ethnic background.

Central City West Specific Plan Purposes/Objectives³⁹

- Implement the goals and policies of the Westlake Community Plan and the Silver Lake-Echo Park Community Plan.
- Protect the existing residential community from further displacement, replace dwelling
 units previously removed from the Specific Plan area, and provide new housing in
 proportion to the need, by household size and income, associated with the existing
 community and new jobs generated in the Plan area.
- Ensure that affordable dwelling units are provided through the establishment of a Housing Linkage Fee, and through the requirement that all new commercial, industrial and mixed use Projects replace affordable dwelling units demolished.
- Ensure that commercial, industrial and mixed use Projects mitigate the impact of their development on the supply of affordable housing stock through the payment of a Housing Linkage Fee and/or the construction of affordable housing within the areas designated by this Specific Plan.

Thus, the Project would not conflict with applicable land use policies, zoning standards, or local, state, or federal policies. No impacts would occur and no further analysis is required.

³⁷ City of Los Angeles Westlake Community Plan, https://planning.lacity.org/complan/pdf/wlkcptxt.pdf, accessed August 14, 2018.

³⁸ City of Los Angeles Silver Lake - Echo Park - Elysian Valley Community Plan, https://planning.lacity.org/complan/pdf/SlkCPTXT.pdf, accessed August 14, 2018.

³⁹ City of Los Angeles Central City West Specific Plan, https://planning.lacity.org/complan/specplan/pdf/CCWest.pdf, accessed August 14, 2018.

c) No Impact. The Project Area is in an urbanized and populated area which is not subject to any habitat conservation plan or natural community conservation plan. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES		-	-	
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	d 🗆			✓
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?				V

a-b) No Impact. According to the City's General Plan Conservation Element, there are no portions of the Project Area that are designated as a mineral resource⁴⁰. The proposed Project itself does not propose or authorize development or expand any land uses therefore, implementation of the Project would not result in the loss of availability of a mineral resource. No impact associated with mineral resources would occur. No further analysis is required.

			Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.			•	-	-	
Woul		e project: Exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			V	
	b)	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?				V
	c)	A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?			V	
	d)	A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?			V	
	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?				V
	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?				V

a) Less Than Significant Impact. The Citywide noise regulations are included in the Chapter XI, of the LAMC. Chapter XI, Section 111.03 sets forth presumed day/night ambient noise levels based on zones. Presumed ambient noise levels for the Project Area for residential zones are 50 dB(A) during the day and 40 dB(A) during the night and 60 dB(A) during the day and 55 dB(A) during the night in commercial zones. Section 112.05 of the LAMC establishes that between the hours of 7 a.m. and 10 p.m. a maximum noise level for construction equipment is 75 dB(A) at a distance of 50 feet when operated within 500 feet of a residential zone. Construction noise from future development would be temporary and

⁴⁰ City of Los Angeles General Plan, Conservation Element, Exhibit A Mineral Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 14, 2018.

exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies would be less than significant. The proposed Project is not a development project and future development as a result of the proposed Project would need to comply with the Citywide noise regulations. Additionally, the proposed Project does not change or expand any allowable land uses, so no additional ambient noise levels would be expected to occur. Therefore, impacts related to noise would be less than significant. No further analysis is needed.

b) No Impact. Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on structures located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels.

The Federal Transit Administration (FTA) and Caltrans have published standard vibration velocities for construction equipment operations. The reference vibration levels (peak particle velocities, PPV) for typical construction equipment is 0.0076 PPV at 25 ft. (in/sec) for a loaded truck and 0.089 PPV at 25 ft. (in/sec) for a large bulldozer⁴¹. These types of equipment can create intense noise that can result in ground vibrations. As described, loaded trucks and large bulldozers are capable of producing vibration levels of approximately 0.076 and 0.089 PPV, respectively, at 25 feet from the source, which is below the FTA threshold of 0.2 PPV for non-engineered masonry and other structures; therefore, these activities would not result in significant vibration impacts.

The Project itself, does not propose or authorize development, nor does it expand allowable land uses. Adoption of the proposed Project to amend the affordable housing requirements of the Specific Plan would not directly result in construction activities and is not expected to induce development or otherwise alter existing development or development patterns, thus, it would not create excessive groundborne vibration or groundborne noise levels. No impact would occur.

- c-d) Less Than Significant Impact. As discussed in Section XII (a), the Project, by itself does not propose or authorize development, nor does it expand allowable land uses and is not expected to induce development or otherwise alter existing development or development patterns. The majority of the Project Area is currently developed with multiple-family and commercial uses that generate noise. It is not anticipated that a substantial increase in noise would occur as these lots are expected to remain their allowable current use. Additionally, future development and construction activity that occurs would be required to comply with the Citywide Noise Regulations pursuant to LAMC Chapter XI. Impacts would be less than significant. No further analysis is required.
- **e-f) No Impact.** As discussed in Section VIII (e) and (f), Hazards and Hazardous Materials, the Project Area is not located within an airport land use plan, or the vicinity of a public airport or private airstrip. Additionally, the Project does not propose or authorize any specific development so no impact would occur. No further analysis is required.

⁴¹ The Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf, accessed August 14, 2018.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	PULATION AND HOUSING		-		
Would th	1 ,				
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)?			V	
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?			V	

a) **Less Than Significant Impact**. The Project would modify the existing affordable housing provisions of the Specific Plan. The proposed amendments do not expand the allowable land uses nor does it intensify development or increase the density of the allowable uses. A main component of the proposed Specific Plan amendment includes adding additional income categories for the required restricted affordable dwelling units. The Project proposes that eight percent of the dwelling units (as allowed by the zone) shall be restricted Extremely Low Income Dwelling Units, or 11% Very Low Income Dwelling Units⁴² as additional options for compliance with the Inclusionary Housing component. Consistent with the Specific Plan's existing provisions, compliance with the affordable housing requirements does not offer any additional incentive or development regulation concession such as increased density or increased height or reduced open space, but would require the restricted affordable dwelling units from any proposed multiple-family residential or mixed use development project absent any incentive or concession per State Law or other City ordinance. The Project Area's existing zoning is generally permissive as the density within the Specific Plan for multiplefamily residential and commercial ranges from R3 density for C1(CW) zones up to R5 density for R5(CW) zones.

The existing zoning within the Project Area is generally permissive and the affordable housing provisions have always been a component of the Specific Plan, thus, substantial population growth is not expected to occur. New development or construction as a result of the Project would be consistent with the existing zoning and impacts related to population growth would be less than significant.

b-c) Less Than Significant Impact. As mentioned in Section XIII (a) above, the Project modifies the Specific Plan's existing affordable housing provisions. Some of the main components of the existing affordable housing regulations includes a requirement of one-for-one replacement of dwelling units or restricting 15% of the dwelling units as Low Income Dwelling Units ⁴³, whichever is greater. The proposed Project is adding the income categories of Extremely Low Income Dwelling Units ⁴⁴ at a set-aside requirement of 8% and Very Low Income Dwelling Units ⁴⁵ at a set-aside requirement of 11% as additional options

⁴² A dwelling unit which is rented or sold to and occupied by "Very Low Income Households" as defined in Section 50105 of the Health and Safety Code.

⁴³ A dwelling unit which is rented or sold to and occupied by "Lower Income Households" as defined in Section 50079.5 of the Health and Safety Code.

⁴⁴ A dwelling unit which is rented or sold to and occupied by "Extremely Low Income Households" as defined in Section 50106 of the Health and Safety Code.

 $^{^{45}}$ A dwelling unit which is rented or sold to and occupied by "Very Low Income Households" as defined in Section 50105 of the Health and Safety Code.

for compliance with the affordable housing provisions. The proposed amendments maintain the Specific Plan's intent to halt demolition without replacement of existing housing while also increasing the affordable housing stock. Additionally, the Project proposes to modify the existing in-lieu fee so that it is aligned with the Citywide Affordable Housing Linkage Fee (Ordinance No. 185,342). The existing in-lieu fee and Citywide Affordable Housing Linkage Fee both facilitate the production of affordable dwelling units. The proposed Project would not displace substantial numbers of existing housing or people necessitating construction of replacement housing elsewhere. Provisions of the existing Specific Plan require that the required restricted affordable dwelling units or replacement dwelling units and dwelling units constructed with the Specific Plan's fees be primarily located within the Project Area. As the Project does not propose or authorize development, and the proposed amendments do not modify the one-for-one replacement or substantially modify the intent of the affordable housing provisions of the Specific Plan, and the Project is not expected to induce development or otherwise alter existing development or development patterns, less than significant impacts would occur. No further analysis is needed.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES Would the project result in: Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services				
i. Fire protection?			√	
ii. Police protection?			✓	
iii. Schools?			√	
iv. Parks?			V	
v. Other public facilities?			✓	

a) i) Less Than Significant Impact. The Los Angeles Fire Department (LAFD) is responsible for providing fire protection and emergency medical services to the Project Area. The Project would modify the Specific Plan's affordable housing provisions. The Project, by itself, does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns.

Table 2, LAFD Fire Stations Serving the Project Area, provides the LAFD Fire stations within one mile to the midpoint of the Project Area. As the Project would not directly result in any increase in population, it is not anticipated that the LAFD would require any additional staffing or need to construct any new or physically altered facilities as a result of the Project. Impacts to fire and emergency services would be less than significant. No further analysis is required.

Table 2: LAFD Fire Stations Serving the Project Area

Fire Station Name	Address	Туре
Fire Station 3	108 N Fremont Avenue	Central Bureau & EMS HQ
Fire Station 9	430 E 7 th Street	Fire Station
Fire Station 10	1335 S Olive Street	Fire Station
Fire Station 11	1819 W 7 th Street	Fire Station
Fire Station 13	2401 W Pico Boulevard	Battalion HQ & EMS HQ
Fire Station 20	2144 W Sunset Boulevard	Fire Station

ii) Less Than Significant Impact. The LAPD is responsible for providing police protection services to the Project Area. Table 3, LAPD Police Stations Serving the Project Area, provides the LAPD stations within one mile to the midpoint of the Project Area. As the Project would not directly induce population growth in the Project Area, it is expected that no new or physically altered police facilities would be necessary to be constructed as a result of the Project. Impacts to police services would be less than significant. No further analysis is required.

Table 3: LAPD Police Stations Serving the Project Area

Police Station Division Name	Address
Rampart	1401 W 6 th Street
Central	251 E 6 th Street

iii) Less Than Significant Impact. The Project Area is located within the boundaries of the Los Angeles Unified School District (LAUSD). The Project modifies the Specific Plan's affordable housing provisions. The Project would not introduce any new population into the Project Area to require the construction of new or physically altered school facilities. Thus, impacts to the elementary, middle, and high schools that serve the Project Area would be less than significant. No further analysis is required. **Table 4, Schools Serving the Project Area** provides the schools closest to or within one mile to the midpoint of the Project Area.

Table 4: Schools Serving the Project Area

School Name	Address
Downtown Magnets High School	1081 W Temple Street
Edward R. Roybal Learning Center	1200 Colton Street
Camino Nuevo Academy #4	1018 W Mohawk Street
Camino Nuevo High School Mirarmar	1215 Miramar Street
Contreras Learning Complex (Academic Leadership Community)	322 Lucas Avenue
Betty Plasencia Elementary School	1321 Cortez Street
Logan Academy of Global Ecology	1711 W Montana St
Rosemont Avenue Elementary School	421 N Rosemont Avenue
Lake Street Primary School	135 N Lake Street
Charles White Elementary School	2401 Wilshire Boulevard
Hoover Street Elementary School	2726 Francis Avenue
Leo Politi lementary School	2481 W 11th Street
Magnolia Avenue Elementary School	1626 S Orchard Avenue
Belmont Senior High School	1575 W 2nd Street
10 th Street Elementary School	1000 Grattan Street
Norwood Street Elementary School	2020 Oak Street
Early College Academy-Los Angeles Trade Tech College	400 W Washington Boulevard
Castelar Street Elementary School	840 Yale Street
Ramon C. Cortines School of Visual and Performing Arts	450 N Grand Avenue
Alliance Ted K Tajima High	1552 W Rockwood Street

iv) Less Than Significant Impact. A significant impact would occur if the Project resulted in substantial population growth that would generate a demand for recreation and park services that would require the construction of new or physically altered park facilities. The Project, by itself, does not propose or authorize any development. Impacts on park and recreation facilities would be less than significant. No further analysis is required. **Table 5**, **Parks Serving the Project Area** provides the parks in whole or in part within the Project Area.

Table 5: Parks Serving the Project Area

Park Name	Address
Vista Hermosa Park	100 N Toluca Street
Patton Street Park	327 Patton Street
Echo Park (Tennis Courts)	526 Glendale Boulevard

v) Less Than Significant Impact. A significant impact would occur if the Project includes substantial population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services. Los Angeles. LAPL provides services at the Central Library, eight Regional Branch Libraries and 64 Community Branch Libraries. As there would not be a substantial increase in population associated with the Project there would be no need for additional library resources or facilities to be constructed. Echo Park Branch Library (1410 W Temple Street) is located within the Project Area and several libraries are located within close proximity to the Project Area including the Central Library (630 W 5th Street). Impacts would be less than significant. No further analysis is required.

XV. REG	CREATION	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?			V	
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?			V	

a-b) Less Than Significant Impact. A significant impact would occur if the Project resulted in substantial population growth that would generate a demand for recreation and park services that would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Project would modify the existing affordable housing provisions of the Specific Plan. The Project, by itself, does not propose or authorize any development and is not expected to induce development or otherwise alter existing development or development patterns. Impacts on existing neighborhood and regional parks or other recreational facilities would be less than significant. Therefore, no further analysis is required.

Less Than

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	ANSPORTATION AND TRAFFIC e project:	•	<u>.</u>	•	
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?			V	
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				V
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				V
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				V
e)	Result in inadequate emergency access?				V
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				V

a) Less Than Significant Impact. The Project itself does not propose or authorize development and traffic volumes are not expected to significantly increase as a result of the proposed amendments to the affordable housing provisions of the Specific Plan. Future development projects would be considered under the Specific Plan discretionary review process and would be subject to their own environmental review.

Traffic associated with the Project would include vehicle trips associated with residential and mixed use developments that include affordable housing units. Since the proposed Project does not increase density or provide incentives that would increase the density or FAR of a site, the Project is not expected to generate significant traffic impacts which would conflict with an applicable plan, ordinance or policy related with traffic. It is possible that new residential or mixed use developments could be established as a result of the Project. However, new residential or mixed use projects would only be permitted in areas currently zoned for residential or mixed uses as the Project does not expand allowable land uses. It is not reasonably foreseeable that modifying the affordable housing provisions by streamlining fees and number of restricted affordable dwelling units in the residential and mixed use zones will cause significantly new construction as the affordable housing provisions have always been part of the Specific Plan. Future development projects would continue to be evaluated on an individual basis, therefore, impacts would be less than significant.

- b) **No Impact.** The Congestion Management Program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010⁴⁶. The CMP is intended to address the impact of local growth on the regional transportation system. The CMP Traffic Impact Analysis (TIA) Guidelines require intersection analyses if a project will add 50 or more trips during either the AM or PM weekday peak hours, or, arterial segments are analyzed if the proposed project will add 50 or more peak hour trips (total of both directions). The proposed Project would modify the affordable housing provisions of the Specific Plan. The Project, by itself, does not propose or authorize any development. It is not reasonably foreseeable that the Project will significantly induce development as the proposed amendments do not increase density, height, FAR, or change any allowable land uses. Future development projects would be subject to their environmental review as part of the Specific Plan discretionary review process. No impact would occur and no further analysis is required.
- c) **No Impact**. As previously stated in Section VIII (e) and (f), Hazards and Hazardous Materials, the Project Area is not located within an airport land use plan area or within two miles of an airport, therefore, no change in air traffic patterns, including either an increase in traffic levels or a change in location would occur. No impact would occur.
- d) **No Impact**. No changes would be made to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way as part of the Project. No impacts related to hazards due to a design feature or incompatible uses would occur. No further analysis is required.
- e) **No Impact**. As discussed in Section VIII Hazards and Hazardous Materials, the Project Area is largely residential, mixed use and commercial and includes City designated disaster routes. The Project by itself does not propose or authorize any development. The Project would not require the closure of any public or private streets, and therefore, would not impede emergency vehicle access to the Project site or surrounding area. No impact would occur.
- f) **No Impact**. The Project itself does not propose or authorize development. The proposed Project modifies the existing affordable housing provisions of the Specific Plan to align the provisions with other State and City affordable housing regulations. As such, the Project would not lead to the disruption of public transportation services or the alteration of public transportation routes. No impact would occur.

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⁴⁶ Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, https://www.metro.net/projects/congestion_mgmt_pgm/, accessed September 11, 2018.

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		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
XVII.	TRIBAL CULTURAL RESOURCES.					
Would th	ne project:					
a)	Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
	 i.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 				V	
	ii.) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				V	

a-b) **No Impact**. Section 5020.1(k) of the Public Resources Code defines "Local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. In the City of Los Angeles, local buildings and sites that meet specific criteria for designation can be declared a "Historic-Cultural Monument (HCM)" by the City Council after recommendation from the Cultural Heritage Commission. There are no "tribal cultural resources" as defined in the Public Resources Code Section 21074 that are designated HCMs in the Project Area.

Further, Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of proposed projects. On September 7, 2018, AB52 Tribal Consultation Notice letters were mailed and no Tribe requested consultation within the 30-day time limit to respond. To date, additional information and materials related to tribal cultural resources have not been submitted.

The Project does not consist of any proposed development projects, includes no ground disturbing activity or any related construction activity and the Project is not expected to induce development or otherwise alter existing development or development patterns, therefore, there is no impact.

Less Than

		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
XVIII.	UTILITIES AND SERVICE SYSTEMS					
Would th	ne project:					
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			V		
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			V		
c)	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			V		
d)	Have sufficient water supplies available to serve the Project from existing entitlements and resource, or are new or expanded entitlements needed?			V		
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?			V		
f)	Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?			V		
g)	Comply with federal, State, and local statutes and regulations related to solid waste?			V		

- Less Than Significant Impact. The Project would modify the existing affordable housing a) provisions of the Specific Plan, the Project, by itself, does not propose or authorize any development. The Project is not intensifying any of the existing allowable land uses thus, existing conditions are not expected to significantly change related to public facilities. Any future development would be restricted to the existing allowable land uses and expected to be within the growth in the City of Los Angeles and region, and would not exceed the Regional Water Quality Control Board (RWQCB) standards for treatment of wastewater or the wastewater treatment capacity. The Project Area is mostly developed with commercial and multiple-family residential uses so individual projects of the same uses as allowed by the existing zone, are not anticipated to result in a significant increase in individual site runoff or changes to the local drainage patterns. The Project would modify the existing affordable housing regulations to align requirements with other State and Citywide regulations. Runoff from individual sites would continue to be collected and directed towards existing storm drains. Sufficient capacity remains at existing solid waste facilities in the region necessary to accommodate the solid waste generated during any new construction-related activities. Any future development projects would be reviewed on a case-by-case basis through the Specific Plan discretionary review process and subject to their own environmental review. Therefore, the Project would result in a less than significant impacts related to wastewater treatment requirements.
- b) Less Than Significant Impact. As mentioned above, in Section XVIII (a), Utilities and Service Systems, the Project, by itself, does not propose or authorize any development and is not intensifying any existing allowable land uses. The Project only modifies the Specific Plan's affordable housing requirements to align with existing State and Citywide regulations. Thus, the Project will not change water consumption or wastewater generation to a degree that would exceed the current serving capacity, impacts would be less than significant.

c) Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

As described in **Section IX (e)**, **Hydrology and Water Quality**, construction activity that occurs pursuant to the Project would not result in a significant increase in individual site runoff or changes to the local drainage patterns. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

No significant increase in new development or construction is expected to occur as a result of this Project. The Project is aligning the affordable housing requirements with existing State and Citywide regulations, therefore, it would not change the existing surface water runoff, and would not create or contribute to runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. Less than significant impacts would occur.

- **d-e)** Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) conducts water planning based on population growth forecast⁴⁷. The Project is not anticipated to induce population growth in the City, therefore, it will not change demand of water or wastewater treatment. As mentioned above, the Project, by itself, does not propose or authorize any development. The Project would align the affordable housing requirements of the Specific Plan with existing State and City regulations. Any additional water and wastewater consumption resulting from the Project will not be substantial as the Project is not intensifying the allowable land uses. Therefore, the impacts are less than significant.
- f) Less Than Significant Impact. The Los Angeles Bureau of Sanitation and private waste management companies are responsible for the collection, disposal, and recycling of solid waste within the City, including the Project related sites. Construction activities associated with development that occurs pursuant to the Project would generate inert waste. Construction waste materials are expected to be typical construction debris, including wood, paper, glass, plastic, metals, cardboard and green wastes. Pursuant to the California Green Building Code, individual project applicants would be required to recycle/divert 65 percent of the construction waste⁴⁸. However, the amount of waste created would not be substantial as the Project, by itself, does not propose or authorize any development. Waste generated by individual development projects would be assessed on a case-by-case basis through the environmental review process. Therefore, the impact is less than significant.
- g) Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The Project, by itself, does not propose or authorize any development. Individual development projects resulting from the proposed changes to the Specific Plan's affordable housing provisions will be required to comply with all federal, state, and local statutes and regulations related to solid waste. All applicable regulations would ensure that the impact is less than significant.

⁴⁷ City of Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, https://www.ladwp.com/ladwp/faces/wcnav_externalld/a-w-sos-uwmp?_adf.ctrl-state=knvpmpzfo_4&_afrLoop=202782395889115, accessed September 11, 2018.

⁴⁸ California Green Building Standards Code,

https://www.calrecycle.ca.gov/LGCentral/Library/CandDModel/Instruction/FAQ/#dates, accessed September 11, 2018.

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		Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact			
XIX. MAN	NDATORY FINDINGS OF SIGNIFICANCE							
Would the	e project:							
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?				V			
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)?				V			
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			V				

a) No Impact. As discussed in Section IV, Biological Resources, the Project by itself, does not propose or authorize any development. Future construction activities occurring as a result of the Project is not expected to impact any endangered fauna or flora and modify any special status species habitat. Due to the urbanized nature of the Project Area and the surrounding area, construction activities and operation of future development would not impact the habitat or population of the Project Area. Additionally, the Project does not propose or authorize any new development in any identified Biological Resource Areas. The Project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in Section V, Cultural Resources, potential impacts related to archaeological and paleontological resources would have no impact as the Project does not propose or authorize any development and future individual development projects would be required to comply with regulatory measures set forth by the California Health and Safety Code, Public Resources Code, and CEQA guidelines.

- b) No Impact. Based on the preceding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. The Project does not propose new development and is not expected to induce development or otherwise alter existing development or development patterns and therefore, would not result in impacts that are cumulatively considerable, therefore no impact would occur.
- c) Less-Than-Significant Impact. As identified throughout the analysis, the proposed Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant. No other impacts have been identified that would result in adverse effects.