

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. Under SB 743, residential, mixed-use, and employment center projects in a transit priority area are exempt from aesthetic impacts analysis. The Subject Lots are all within a transit priority area.² (See SCAG's Transit Priority Area 2045.) Further, most development that is reasonably foreseeable on these Subject Lots would be residential, mixed-use, or an employment center and therefore, as a matter of law, would not have aesthetic impacts under the CEQA Guidelines. Therefore, it is reasonable to assume that the Proposed Project would not have foreseeable aesthetic impacts for these qualifying projects. With that said, the relevant language of SB 743, codified at Public Resources Code Section 21099(d), does not expressly apply to zone change ordinances. To be conservative, this negative declaration will consider the aesthetic impacts from the implementation of the Proposed Project on the Subject Lots and the surrounding project vicinity. The evaluation of aesthetic impacts is a subjective exercise, both in identifying valued aesthetic resources and identifying significant impacts to valued aesthetic resources. For purposes of CEQA, the City does not protect private views and the loss of a private view would not be an impact for purposes of this environmental analysis.

The City's General Plan Conservation Element defines scenic vistas as "the panoramic public view access to natural features, including the views of the ocean, striking or unusual natural terrain, or unique urban or historic resources." The panoramic public views in the West Adams CPA are of the Santa Monica Mountains, and the Pacific Ocean. The majority of the West Adams CPA is flat and only limited views are available of these distant features. The existing viewshed surrounding the Subject Lots are built out with existing urban development containing institutional, commercial, and residential structures from single to two stories in height. There are no prominent topographical features in the Project Area from which scenic vistas could be viewed. A substantial adverse effect on scenic vistas would occur if implementation of the Proposed Project would result in the loss and/or significant obstruction of scenic views or change the character of views or change the character of the view of the Santa Monica Mountains.

The Proposed Project is to adopt a permanent [Q] Qualified classification zone change ordinance to apply minimum lot standards involving the construction of new buildings or additions to existing buildings that incorporate commercial, mixed-use, or multi-family uses. As such, the Proposed Plan would not result in a loss of scenic vistas. The Subject Lots are all developed with existing single-family homes and low scale multi family apartments that are limited to a single story or two story structures.

² http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20_1, accessed 11.14.19

The Proposed Project only establishes minimum lot standards and would not change the maximum density, FAR, height, or any other regulation applicable to the Subject Lots. The purpose of increased minimum lot standards is to encourage more compatible design outcomes that address the overall pattern of development and character of surrounding areas. A larger minimum lot size can allow for greater transitions in scale and height when tailoring the building envelope in lower-density neighborhoods, improved pedestrian-oriented design, and increased compatibility between the commercial corridors along Slauson Avenue and Crenshaw Boulevard and adjacent residential uses. The Proposed Project is not anticipated to induce the specific construction of any particular residential, commercial or mixed-use development project. Therefore, the Proposed Project would result in no impact related to scenic vistas. No further analysis is required.

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 state scenic highway?

No Impact. See SB 743 discussion above. No state scenic highways are located in the Project Area. As such, the Proposed Project cannot damage any scenic resources within a state scenic highway. Therefore, the Proposed Project would result in no impact. No further analysis is required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. See SB 743 discussion above. 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 Subject Lots are located in a largely urbanized area developed with existing single-family and low scale multi-family uses. The Proposed Project is a zone change to apply minimum lot standards for the development of additions or new commercial, mixed-use and multi-family projects on the Subject Lots. The Proposed Project is not anticipated to induce the specific construction of any particular residential, commercial or mixed-use development project. As discussed above, the Proposed Project only seeks to address design and compatibility between adjacent commercial and residential uses which is consistent with the goals and policies to protect scenic quality in the West Adams Community Plan. The Proposed Project would not change the maximum density, FAR, height, or any other regulation applicable to the Subject Lots. Based on the analysis above, the Proposed Project would not alter the existing visual character or quality of the site and its surroundings. Therefore, the Proposed Project would result in no impact. No further analysis is required.

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

No Impact. See SB 743 discussion above. 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 Subject Lots are currently improved with single-family and low-scale multi-family residential uses with existing levels of ambient nighttime lighting, including nearby street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights. The Proposed Project is limited to a zone change to apply minimum lot standards to additions of existing buildings and new construction projects associated with commercial, mixed-use, and multi-family residential uses on the Subject Lots. As discussed above, the Proposed Project only seeks to address design and compatibility between adjacent commercial and residential uses which is consistent with the goals and policies to protect scenic quality in the West Adams Community Plan. The Proposed Project would not increase or decrease the maximum density, FAR, height, or change any other regulation applicable to the Subject Lots.

Those existing uses of the Subject Lots which already produce light (as in the case of existing homes), are already located near Crenshaw Boulevard or Slauson Avenue that are currently developed with uses contributing to the ambient light levels in the Project Area. Future development may occur on one or more of the Subject Lots including demolition and modifications to existing structures and new development. However, no specific development would occur as a direct result of the Proposed Project. In addition, future development projects would be required to comply with all existing regulations that address light and glare, including but not limited to LAMC Chapter 9, Article 3 Section 93.0117. Therefore, the Proposed Project would result in no impact with regard to light and glare. No further analysis is required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. The 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 category.³ Furthermore, none of the Subject Lots are categorized as significant farmland. The Proposed Project is a zone change that only applies to additions to existing buildings and new commercial, mixed-use, and multi-family developments on the Subject Lots currently zoned commercial (C2) and would not apply to sites zoned for agricultural use. Therefore, the Proposed Project would not convert farmland to non-agricultural use and no impacts related to farmland would occur. No further analysis is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

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 to commercial lots zoned C2 for additions and new construction projects that include commercial, mixed-use, or multi-family uses. Accordingly, the Subject Lots do 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 and no impacts would occur. No further analysis is required.

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

No Impact. The Subject Lots consist of single-family uses and low scale multi-family uses with properties zoned commercial (C2). The Subject Lots and the surrounding areas do not contain any forest land or land zoned for timberland production.⁴ Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland and no impacts would occur. No further analysis is required.

d) Result in the loss of forestland or conversion of forestland to non-forest use?

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

³ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring, accessed October 22, 2019

Program, Los Angeles County 2016 Important Farmland Map, <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed October 22, 2019.

⁴ City of Los Angeles General Plan, Conservation Element, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed October 22, 2019.

wildlife, biodiversity, water quality, recreation, and other public benefits.”⁵ 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.”⁶ A minimal variety of street trees are located on parkways adjacent to the Subject Lots, but are largely ornamental. There is no forestland or timberland associated with the Proposed Project. Therefore, the Proposed Project results in no impacts. No further analysis is required.

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 forestland to non-forest use?

No Impact. See responses to Sections 2 (a) through (d) above. The Proposed Project, by itself, does not propose or authorize development. Development (e.g., demolition, addition to, new construction) that occurs pursuant to the Proposed Project would not result in the conversion of farmland or forestland to other uses. Therefore, the Proposed Project results in no impacts. No further analysis is required.

⁵

California Public Resources Code Section 12220[g]

⁶

California Public Resources Code Section 4526

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Conflict with or obstruct implementation of the applicable air quality plan?

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 South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG).⁷

The Proposed Project does not propose or authorize any ground disturbing or development activity. As discussed above, the Proposed Project only seeks to address design and compatibility between adjacent commercial and residential uses. The Proposed Project would not change the maximum density, FAR, height, or any other regulation applicable to the Subject Lots.

The Proposed Project is limited to a zone change to adopt a permanent [Q] Qualified Classification to apply minimum lot standards to additions and new construction involving commercial, mixed-

⁷ South Coast Air Quality Management District, Final Air Quality Management Plan; <http://www.aqmd.gov/docs/default-source/clean-air-plans/airquality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, accessed October 24, 2019.

use, or multi-family uses on the Subject Lots. The Proposed Project would not increase or decrease the maximum density, FAR, height, or change any other regulation applicable to the Subject Lots.

The Proposed Project is not anticipated to induce construction on the Subject Lots, therefore, it is not reasonably foreseeable that the Proposed Project will cause additional impacts to air quality as no development or construction is proposed or incentivized. Since the Subject Lots are located in an urbanized environment with existing residential, commercial, and industrial buildings, potential future traffic impacts were already included in the AQMP. Therefore, the Proposed Project does not conflict with the applicable air quality plan or obstruct implementation of the applicable air quality plan and would result in no impacts. No further analysis is required.

b) 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?

No Impact. As described above in Section III (a), the Subject Lots are located in an urbanized environment with existing public facilities, residential, industrial, and commercial buildings, traffic impacts that would have been included in the AQMP. The Proposed Project does not authorize or propose any development project. Therefore, the Proposed Project does not 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 standards and no impacts would occur. No further analysis is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant⁸. According to the SCAQMD, land uses where sensitive receptors are typically located include schools, playgrounds, and childcare centers; long-term health care facilities; rehabilitation centers; hospitals; retirement homes; and residences. As described above in Section III (a) and (b), the Proposed Project does not propose or authorize development. The Proposed Project is limited to a zone change to adopt a permanent [Q] Qualified Classification to apply minimum lot standards to additions and new construction projects involving commercial, mixed-use, or multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any development, therefore, it is not reasonably foreseeable that the Proposed Project would expose sensitive receptors to substantial pollutant concentrations. Therefore, the Proposed Project would result in a less-than-significant impact. No further analysis is required.

⁸ South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning; accessed on October 22, 2019

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

Less Than Significant Impact. According to the SCAQMD, 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 molding.⁹ The Proposed Project does not authorize or propose any new ground disturbing or other development activity. The Proposed Project is limited to a zone change to adopt a permanent [Q] Qualified Classification to apply minimum lot standards to additions and new construction projects involving commercial, mixed-use, or multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any development. Any future development projects would still be subject to individual development project review and subject to any existing LAMC regulations regarding odors or other emissions. Impacts related to odors from future development on the Subject Lots would generally be due to construction activities and would be typical of most construction sites. Additionally, the odors from the construction of individual future development projects would be temporary and the construction activity would be required to comply with SCAQMD Rule 402.¹⁰ Therefore, the Proposed Project would result in a less-than-significant impact. No further analysis is required.

⁹ 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>, accessed October 24, 2019.

¹⁰ 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.

IV. BIOLOGICAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------	--	------------------------------	-----------

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Less Than Significant Impact. 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 City.¹¹ These habitat types include Inland Habitats, Significant Ecological Areas (SEA), Wildlife Corridors, Ocean, and Coastal Wetlands.

The Subject Lots are located in an urbanized setting and are not generally within the vicinity of Inland habitats, SEAs, Wildlife Corridors, Ocean or Coastal Wetlands. The Proposed Project does not propose to change any existing land uses or authorize any new development in any habitat areas identified above, or expand any new or existing allowable land uses. The Proposed Project is limited to a zone change to adopt a permanent [Q] Qualified Classification to apply minimum lot standards to additions and new construction projects involving commercial, mixed-use, or multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any development.

Sensitive species identified in the West Adams Community Plan area are the monarch butterfly, the Burrowing Owl pallid bat, western mastiff bat, hoary bat and American badger, and birds that are commonly found in, and are tolerant of urban environments.¹² The Proposed Project involves the adoption of a zone change to apply a permanent [Q] Qualified Classification for the Subject Lots. The Proposed Project applies minimum lot standards to additions of existing buildings and new construction projects involving commercial, mixed-use or multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any development. The Proposed Project would have no 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. Therefore, the Proposed Project would result in less-than-significant impacts related to candidate, sensitive, or special status species. No further analysis is required.

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

No Impact. The Subject Lots are located in an urbanized setting in the West Adams Community Plan. No wetlands, riparian habitat or other sensitive natural communities exist within the Subject Lots. Within the West Adams Community Plan area, riparian habitat is limited to small areas in

¹¹ City of Los Angeles General Plan, Conservation Element, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed October 23, 2019.
¹² <https://planning.lacity.org/eir/WestAdams/DEIR/4.4%20Biological%20Resources.pdf>

the Kenneth Hahn State Recreation Area.¹³ Due to extensive hydrologic modification, riparian habitat along Ballona Creek and tributary streams is virtually nonexistent. Because no significant watercourses presently flow through the Kenneth Hahn State Recreation Area and the existing riparian habitat is supported largely by landscape maintenance or its runoff or other runoff within the park, this habitat includes patches of only a limited number of plant species typically associated with riparian vegetation in the region, such as arroyo willow (*Salix lasiolepis*) and mule fat (*Baccharis salicifolia*)¹⁴. The Kenneth Hahn State Recreation Area is located approximately 2 miles from the Subject Lots. The Proposed Project would have no 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, the Proposed Project would result in less-than-significant impacts related to riparian habitat or other sensitive natural communities. No further analysis is required.

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

No Impact. There are two categories of wetlands, coastal/tidal wetlands and inland/non-tidal wetlands. Inland/non-tidal wetlands are most common on floodplains along rivers and streams (riparian wetlands), in isolated depressions surrounded by dry land (for example, playas, basins and "potholes"), along the margins of lakes and ponds, and in other low-lying areas where the groundwater intercepts the soil surface or where precipitation sufficiently saturates the soil (vernal pools and bogs)¹⁵. A significant impact would occur if federally protected wetlands would be modified or removed by a development project. Here, the Proposed Project does not propose or authorize any development project, nor does it propose or modify any City regulations that would adversely affect federally protected wetlands as defined by Section 404 of the Clean Water Act. The Proposed Project applies minimum lot standards to additions of existing buildings and new construction projects involving commercial, mixed-use or multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any new development. In addition, the Subject Lots are located in the West Adams Community Plan area where the only significant watercourse is the Ballona Creek. The Ballona Creek is a concrete-lined channel that does not support wetland flora or fauna. Wetlands could also potentially be located within the Kenneth Hahn State Recreation Area. However, both the Ballona Creek and the Kenneth Han State Recreation area are located approximately 1.3 miles and approximately 2 miles respectively from the Subject Lots. Therefore, the Proposed Project would result in no impacts related to wetlands. No further analysis is required.

¹³ <https://planning.lacity.org/eir/WestAdams/DEIR/4.4%20Biological%20Resources.pdf> pg. 4.4-7

¹⁴ <https://planning.lacity.org/eir/WestAdams/DEIR/4.4%20Biological%20Resources.pdf> pg. 4.4-14

¹⁵ United States Environmental Protection Agency, Wetlands, <https://www.epa.gov/wetlands/what-wetland>, accessed October 23, 2019.

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?

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 on the Subject Lots. However, some trees on the Subject Lots may potentially support migratory birds. In which case, the City's existing regulatory compliance measures would include the enforcement of the Migratory Bird Treaty Act (MBTA) which governs the taking, killing, possession, transportation, selling, purchasing, and bartering of any migratory birds, their eggs, parts, and nests.

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 Proposed Project itself does not propose or authorize development and is not expected to induce development or otherwise alter existing development, therefore, no impacts would occur and no further analysis is required.

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

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 adjacent to the Subject Lots and on private property that may potentially meet the requirements of the City's Protected Tree Ordinance. The Proposed Project does not propose or authorize any ground disturbing activities or development activity and is not expected to induce development or otherwise alter existing development. The Proposed Project is a zone change ordinance to adopt regulations to apply minimum lot standards for existing additions and new construction projects involving commercial, mixed-use or multi-family uses on the Subject Lots. Construction activities that occur pursuant to the Proposed Project would be required to comply with the City's Protected Tree Ordinance.

Therefore, the Proposed Project would result in less-than-significant impacts related to tree preservation. No further analysis is required.

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

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

V. CULTURAL RESOURCES

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

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

Less Than Significant 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. 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.

The Subject Lots contain no federal, state, or city designated historical resources. None of the Subject Lots have resources eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or for local designation as City Historical Cultural Monuments (HCM), or Historic Preservation Overlay Zone (HPOZ), commonly known as historic district. Some of the Subject Lots are listed in Survey LA as part of the Angeles Mesa Streetcar Suburb Planning District. Planning Districts, however, do not meet eligibility standards for historic designation but can merit consideration in local planning.

The Proposed Project involves the adoption of a zone change to apply a permanent [Q] Qualified Classification for the Subject Lots. The Proposed Project applies minimum lot standards to additions of existing buildings and new construction projects involving commercial, mixed-use or

multi-family uses on the Subject Lots. The Proposed Project is not anticipated to induce construction of new residential, commercial or mixed-use development, as it does not incentivize any development. Therefore, the Proposed Project would result in a less-than-significant impact related to historic resources. No further analysis is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less than Significant 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.

The Subject Lots have been highly disturbed and any archeological resources that may have existed at the surface have likely been disturbed by past development. Any future development on the Subject Lots 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 archaeological 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.

The Proposed Project is limited to the adoption of a zone change ordinance to apply minimum lot standards for new construction projects and additions to existing buildings that involve commercial, mixed-use or multi-family uses on the Subject Lots. The Project does not propose or authorize any ground disturbing or other development activities and is not expected to induce development or otherwise alter existing development. Therefore, the Proposed Project would result in a less-than-significant impact. No further analysis is required.

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

Less than Significant Impact. There are no known formal cemeteries on the Subject Lots and no history of historical or prehistoric human remains on-site. The Proposed Project is a zone change ordinance to adopt a [Q] Qualified Classification to apply minimum lot standards for new construction projects and additions to existing buildings that involve commercial, mixed-use or

Crenshaw Corridor Specific Plan [Q] Qualified Classification Zone Change

multi-family uses on the Subject Lots. The Project does not propose or authorize any ground disturbing or other development activities and is not expected to induce development or otherwise alter existing development structure. 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). Therefore, the Proposed Project results in a less-than-significant impact related to human remains.

VI. ENERGY

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

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

No Impact. The Proposed Project is limited to a zone change to apply minimum lot standards for new construction projects and additions to existing buildings that incorporate commercial, mixed-use and multi-family uses for the Subject Lots. As the Proposed Project does not consist of a development project, there is no construction activity and consequently no activity associated with the operation of a structure. The Proposed Project is not expected to induce development and would not change the maximum density, FAR, height, or change any other regulation applicable to the Subject Lots other than minimum lot area. Future development to occur subsequent to the adoption of the Proposed Project would remain subject to the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Standards Code. The LAGBC serves as the mechanism to regulate and reduce a building's energy use, water use and overall carbon footprint. As the Proposed Project is not proposing any development, it is not reasonably foreseeable that there would be a significant direct or indirect effect to the environment due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Proposed Project would result in no impact related to energy resources. No further analysis is needed.

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

No Impact. A significant impact would occur if the Proposed Project were to conflict or obstruct a state or local plan for renewable energy or energy efficiency. Any future development would be subject to the City's Green Building Code (Ord. No. 181,479 and Ord. No. 181,480), which was adopted to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional, and global ecosystems. The California Energy Commission is the state's primary energy policy and energy planning agency responsible for assessing California's energy systems and trends as well as generating information resulting in renewable energy and energy efficiency promoting policies.¹⁶ There are several adopted State bills that promote renewable energy and energy efficiency for which future development projects will be required to comply including but not limited to: Senate Bill (SB) 350 Clean Energy and Pollution Reduction Act (2015), Assembly Bill 2514 Energy Storage System Procurement Targets from Publicly Owned Utilities (2010); and Assembly Bill (AB) 802 Building Energy Benchmarking Program (2015). Some of these new policies inform and/or expand the framework for local plans, programs, and regulations regarding renewable energy and increased energy efficiency including, but not limited to: the City of Los Angeles' Green New Deal Plan the Los Angeles Green Building Code; and implementation of AB 802, the City's Existing Buildings Energy and Water Efficiency (EBEWE) Program. As the Proposed Project is limited to a zone change ordinance to adopt regulations to apply minimum lot standards for additions or new construction of buildings involving commercial, mixed use or multi-family uses on the Subject Lots and no project is proposed or authorized; the Proposed Project will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, no impacts would occur, no further analysis is required.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

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 Subject Lots are located within the Alquist-Priolo Earthquake Fault Zone¹⁷. The Proposed Project does not propose or authorize any development and is not expected to induce development or otherwise alter existing development so no ground rupture is expected to occur from the proposed ordinance. The Proposed Project does 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, the Proposed Project would result in no impacts related to ruptures of earthquake faults. No further analysis is required.

ii) **No Impact.** The Subject Lots are located within seismically active Southern California and therefore, could be subject to moderate and possibly strong ground motion due to earthquakes on the Newport-Inglewood-Rose Canyon fault, Puente Hills Blind Thrust fault, or Puente Hills blind thrust system¹⁸. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots.

All future development on the Subject Lots would be required to comply with all relevant California Building Code (CBC)¹⁹ 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. Implementation of the Proposed Project does not trigger new development or construction and is not expected to induce development or otherwise alter existing development. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

¹⁷ City of Los Angeles General Plan, Safety Element, Exhibit A Alquist-Priolo Special Study Zones & Fault Rupture Study

Areashttps://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed October 23, 2019.

¹⁸ NavigateLA, <http://navigate.lacity.org/navigate/>, accessed October 23, 2019.

¹⁹ 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.

- 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. There are portions of the Subject Lots that are susceptible to liquefaction²⁰ and thus susceptible to seismic-related ground failure such as lateral spreading, subsidence, or settlement. Construction activities that occur would be required to comply with current seismic design provision of the California Building Code and City's Building Code, which incorporates relevant provisions related to protection against liquefaction. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots. The implementation of the Proposed Project does not trigger new development or construction and is not expected to induce development or otherwise alter existing development. Therefore, the Proposed Project would result in no impact. 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 shear strength, and increased water pressure. The Subject Lots are located in a section of the City that is relatively flat in character. None of the Subject Lots are located in areas susceptible to landslides²¹. In general, development on the Subject Lots would be required to comply with all applicable regulations and design standards of the LAMC, which sets specific building requirements beyond the CBC. In addition, if deemed necessary by the 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 any development project would not create substantial geologic risk due to landslides. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots. The implementation of the Proposed Project does not propose or authorize new development or construction and is not expected to induce development or otherwise alter existing development. No further analysis is required.

b) Result in substantial soil erosion or the loss of topsoil?

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

²⁰ NavigateLA, <http://navigatea.lacity.org/navigatea/>, accessed October 23, 2019.

²¹ NavigateLA, <http://navigatea.lacity.org/navigatea/>, accessed October 23, 2019.

carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Subject Lots are located in a section of the City that is relatively flat. As the West Adams CPA is a highly urbanized area covered by impermeable surfaces, the potential for erosion is relatively low. Construction activities in designated 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. 181,899). 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 is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots. The Proposed Project does not propose or authorize development and is not expected to induce development or otherwise alter existing development. Implementation of the Proposed Project would not result in substantial erosion or loss of topsoil. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

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

No Impact. As previously discussed in Section VII (a.iii), the Subject Lots are susceptible to liquefaction. However, the Proposed Project does not propose or authorize development and does not authorize or expand any allowable land uses. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots. 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. The Proposed Project would result in no impacts. No further analysis is required.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

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 does not authorize or expand any new or allowable land uses. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-

family uses. The Proposed Project would apply minimum lot standards to the Subject Lots which is not expected to induce development or otherwise alter existing development. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. As the West Adams CPA is a highly urbanized area, it already includes existing public infrastructure for wastewater disposal systems. The Proposed Project does not propose or authorize development and does not authorize or expand any allowable land uses. The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots involving additions or new construction projects for commercial, mixed-use or multi-family uses. The Proposed Project would apply minimum lot standards to the Subject Lots. The use of septic tanks or alternative wastewater disposal systems would not be required. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

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.

The Proposed Project does not propose or authorize any development and is not expected to induce development, involve any ground-breaking activities or otherwise alter existing development. Proposed Project involves the adoption of a zone change ordinance to apply minimum lot area and width standards for new construction projects and additions to existing buildings that include commercial, mixed-use or multi-family uses on the Subject Lots. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

VIII. GREENHOUSE GAS EMISSIONS

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

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?

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. 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)²²

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

²² Nitrogen trifluoride was not listed initially in AB 32 but was subsequently added to the list via legislation.

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 sector²³.

The Proposed Project is the adoption of a permanent [Q] Qualified classification zone change ordinance for the Subject Lots. The Proposed Project applies minimum lot standards for projects involving the construction of new buildings and additions to existing buildings that incorporate commercial, mixed-use or multi-family uses on the Subject Lots. The permanent “[Q] condition” requires a minimum developable lot area of 10,000 square feet and a minimum developable lot width of 100 feet, as measured along any General Plan designated Local or Collector Street frontage. This change would limit single lot development by doubling the current minimum lot area requirement of 5,000 square feet and the current minimum lot width requirement of 50 feet. Except for the regulations of the proposed permanent [Q] condition, current zoning for the Subject Lots will remain unchanged. The existing General Plan land use designation of Neighborhood Commercial for the lots northerly of Slauson, and Community Commercial for the remaining lots adjacent to Crenshaw would also remain unchanged. The Proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development.

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.

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, the Proposed Project would result in less-than-significant impacts. No further analysis is required.

²³ 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 October 25, 2019

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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 Proposed 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 Proposed Project would occur in conformance with all applicable local, state, and federal regulations governing such activities.

Operation of future commercial, multi-family 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. The Proposed Project does not propose or authorize development and would not authorize or expand any new or allowable land uses and is not expected to induce development and does not increase nor decrease the maximum density, FAR, height, or change any other regulation other than to establish minimum lot standards. Therefore, the Proposed Project results in no impacts related to the use, transport and disposal of hazardous materials. No further analysis is required.

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?

Less Than Significant Impact. Refer to Section IX (a) above. Some existing structures on the Subject Lots 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 accidentally 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 seq. requires that all LBPs be abated and removed by a licensed lead contractor. The Proposed Project does not authorize or propose any new development and is not expected to induce development or otherwise alter existing development. Therefore, the Proposed 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. Therefore, the Proposed Project would result in less than significant impacts related to upset and accident conditions. No further analysis is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are a few schools located within a ¼ mile of the Proposed Project Area. The Proposed Project does not authorize or propose any new development. As discussed in Section IX (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 Proposed Project would result in less than significant impacts related to schools. No further analysis is required.

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?

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 is one active DTSC Clean Up Site located adjacent to the Project Area, but no DTSC Hazardous Waste Sites. In addition, there are three Lust Cleanup Sites and one Cleanup Program Site that are closed.²⁴

Table 2: Cortese List²⁵

Facility Name	Address	Type
Hi-Tech Cleaners	3417 West Slauson Avenue, LA 90043	DTSC Site Cleanup Program
Thrifty Payless	5701-5749 Crenshaw Blvd. LA 90043	Cleanup Program Site
Lee’s Arco Smog Pros	5804 Crenshaw Blvd. LA 90043	Lust Cleanup Site
Slauson Gas & Mart	3708 Slauson Avenue LA 90043	Lust Cleanup Site

²⁴ GeoTracker Site/Facility Type Definitions, https://geotracker.waterboards.ca.gov/site_type_definitions, accessed October 23, 2019.

²⁵ California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/SiteCleanup/CorteseList/>, accessed October 23, 2019

Shell	5805 Crenshaw Blvd. LA 90043	Lust Cleanup Site
-------	------------------------------	-------------------

It is considered unlikely that the Proposed Project would produce any impact causing a significant hazards risk to the public. The Proposed Project does not propose or authorize any development projects, and is limited to the application of minimum lot standard requirements for the Subject Lots, and is not expected to induce development. The Proposed Project would impose a minimum developable lot area of 10,000 square feet and a minimum developable lot width of 100 feet, as measured along any General Plan designated Local or Collector Street frontage for any new construction project or addition to existing buildings incorporating commercial, mixed-use and multi-family uses for the Subject Lots. This change would limit single lot development by doubling the current minimum lot area requirement of 5,000 square feet and the current minimum lot width requirement of 50 feet. Any future development that occurs in the Project Area would be required to comply with existing regulations related to hazardous materials. In addition, as a condition of approval for discretionary or change area projects in the West Adams Community Plan EIR Mitigation Measures, HM1 states that the City shall require a Phase I Environmental Site Assessment be prepared to ensure that potential hazards are evaluated and mitigated. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies.²⁶ Therefore, with compliance of state and local laws and regulations, the Proposed Project would result in less than significant impacts related to hazardous materials sites. No further analysis is required.

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

No Impact. The Subject Lots are not located within an airport land use plan or within the vicinity of a public airport or private airstrip. Public airports closest to the Subject Lots are the Los Angeles International Airport – located approximately 6 miles away, Hawthorne Municipal Airport – located approximately 6 miles away, and the Santa Monica Airport in the City of Santa Monica – located approximately 8 miles away. The nearest private airstrip dedicated to noncommercial air travel is the Van Nuys airport, located approximately 40 miles to the north from the Subject Lots. As no airports are in close proximity to the Subject Lots, the Project Project would result in no impacts related to airport hazards. No further analysis is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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 U.S. Department of Interior National All-Hazards approach to major disasters such as fires, floods,

²⁶ https://planning.lacity.org/eir/westadams/feir/Appendix_K_and_Appendix_L.pdf, pg. 30

earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments.²⁷

The Subject Lots consist of single-family residential homes and low scale multi-family developments and is approximately one mile away from a City-designated disaster route.²⁸ Adoption of the Proposed Project would not require or result in modifications to any of the roadways that would impact emergency traffic. The Proposed Project does not propose or authorize development and would not make changes to existing policies, programs, or regulations that address emergency response. The Proposed 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. Therefore, the Proposed Project would result in no impacts related to emergency response plans. No further analysis is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Subject Lots are located within a highly urbanized area. The Very High Fire Hazard Severity Zone comprises most of the hills and mountainous regions of the City, and does not include the Subject Lots. The closest Very High Fire Hazard Severity Zone is approximately one mile north of the Subject Lots in the Baldwin Hills neighborhood.²⁹

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 Subject Lots do not contain any Red Flag Restricted Areas. The Proposed Project does not propose or authorize any development or authorize or expand any allowable land uses. The Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Therefore, the Proposed Project would result in no impacts related to wildland fires. No further analysis is required.

²⁷ Emergency Management Department, Emergency Operations Center, <http://emergency.lacity.org/eoc>, accessed October 23, 2019.

²⁸ City of Los Angeles, Safety Element, Exhibit D, November 1996, pg. 53

²⁹ NavigateLA, <http://navigateLA.lacity.org/navigateLA/>, accessed October 23, 2019.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

No Impact. A significant impact may occur if a development project discharges water, which does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a development project does not comply with all applicable regulations with regard to surface water quality as governed by the Los Angeles Regional Water Quality Control Board (“LARWQCB”) or the State Water Resources Control Board (“SWRCB”).

The Proposed Project does not authorize or expand any land uses and does not include any point-source discharge (discharge of polluted water from a single point such as sewage-outflow pipe). Stormwater runoff from any future development has the potential to introduce small amounts of pollutants into the stormwater system. Pollutants would be associated with runoff from landscaped areas (pesticides and fertilizers) and paved surfaces (ordinary household cleaners). However, the Proposed Project would be required to comply with the National Pollutant Discharge Elimination System (“NPDES”) standards and the City’s Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the project site are minimized for downstream receiving waters. The ordinances contain requirements for construction activities and operation of projects to integrate low impact development practices and standards for stormwater pollution mitigation, and maximize open, green and pervious space on all projects consistent with the City’s landscape ordinance and other related requirements in the City’s Development Best Management Practices (BMPs) Handbook. Conformance would be ensured during the City’s building plan review and approval process. Further, the LARWQCB issued Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges (NPDES Permit No. CAS004001), which requires new development and redevelopment projects to incorporate stormwater mitigation measures. Depending on the type of project, either a SUSMP or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves a project site. Future development projects, when applicable, are also required to comply with the City of Los Angeles Low Impact Development (LID) Ordinance No. 181,899³⁰, 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 projects. Therefore, the Proposed Project would not result in no impacts related to water quality and waste discharge. No further analysis is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No 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 according to the Five-Year Average, Fiscal Year 2012-2016, water was supplied by the

³⁰ Ordinance No. 181,899, http://clkrep.lacity.org/online/docs/2009/09-1554_ord_181899.pdf, accessed October 24, 2019.

Metropolitan Water District (MWD) at 64 percent (broken down by Bay Delta at 54 percent and Colorado River at 10 percent); the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (20 percent), local groundwater (14 percent), and recycled water (2 percent)³¹. Based on the City's most current Urban Water Management Plan (UWMP)³² in 2011-2014 the LADWP had a total water demand of 566,990 acre-feet per year with approximately 209,651 acre-feet or 37% of the demand from single-family; 165,364 acre-feet or 29% of the demand from multi-family; 98,994 acre-feet or 17% from commercial; 17,663 acre-feet or 3% from industrial; 42,453 acre-feet or 8 % from government; and 32,774 acre-feet from non-revenue sources. The Subject Lots are developed with single-family uses and low scale multi-family uses and would not be expected to substantially change surface area on the lots as the Proposed Project is limited to the application of minimum lot standards to the Subject Lots. The Proposed Project does not propose or authorize development and will not incentivize development. The Proposed Project does not extract groundwater or directly use wells, does not propose any ground disturbing activities (e.g. excavation) that would affect existing aquifers or the existing water table. Therefore, the Proposed Project would result in no impacts related to groundwater supplies. No further analysis is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

ii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iii. Impede or redirect flood flows?

No Impact. Significant impact would occur if the Proposed Project substantially altered the drainage pattern or an existing stream or river, so that substantial erosion or siltation would result on- or off-site. In general, the Subject Lots are developed and built-out with single-family residential uses and low scale multi-family residential uses. There are no natural watercourses located within the Subject Lots.³³

³¹ 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&_afLoop=430938015435485, accessed October 24, 2019.

³² Los Angeles Department of Water and Power – 2015 Urban Water Management Plan, website: https://www.ladwp.com/ladwp/faces/wcnnav_externalld/a-w-sos-uwmp;jsessionid=xfbvbyzXCCdnN6nmkbznXJSp86hLJgvnrFB12bQLsdSrFSvSfyKT!-1896400610?_afLoop=353937528751225&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D353937528751225%26_afWindowMode%3D0%26_adf.ctrl-state%3D9enb0ard3_4, accessed October 24, 2019.

³³ NavigateLA, <http://navigatea.lacity.org/navigatea/>, accessed October 24, 2019

As discussed in Section X (a) above, development that occurs on the Subject Lots 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 Subject Lots after a storm event. The Proposed Project does not propose or authorize development. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Any future development indirectly related to the Proposed Project would not substantially alter the existing drainage pattern of the Project Area. The Proposed Project would not place structures that would impede flood flows within a 100-year or 500-year flood plain. Therefore, the Proposed Project would result in less than significant impacts related to stormwater drainage. No further analysis is needed.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. 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. The Subject Lots are located more than five miles inland from the Pacific Ocean and the elevation ranges from approximately 100 to 425 feet above sea level. Therefore, the potential for tsunamis to affect the project site is considered low.

A significant impact may also 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. There are no surface water bodies in the Project Area that are potentially susceptible to seiche events during strong earthquakes or are potential sources of inundation. No parts of the Subject Lots are located within a potential inundation area³⁴ or subject to flooding as a result of inundation from water storage facilities. The Proposed Project does not include any development and only relates to the adoption of a zone change ordinance to apply minimum lot standards for additions to existing buildings and new construction projects involving commercial, mixed-use or multi-family uses for the Subject Lots. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Implementation of existing City policies and standards, including the City's Flood Hazard Management Specific Plan, including Ordinance No. 172,081 would ensure the adoption and implementation of the Proposed Project would not expose people or structures to substantial risk due to geologic hazards that lead to flood hazards/mudflows, seiches or tsunamis. Therefore, the Proposed Project would result in no impact related to inundation by flood hazard/mudflow, tsunami, or seiche. No further analysis is necessary.

³⁴ City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, <http://planning.lacity.org/cwd/gnlpln/safteyelt.pdf>, access October 24, 2019.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. A significant water quality impact may occur if a project is not consistent with water quality control plans or sustainable groundwater management plans. The Proposed Project does not propose or authorize any development. The Proposed Project is not intensifying any of the existing allowable land uses, thus, existing conditions are not expected to significantly change or cause a conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Any future development would be restricted to the existing allowable land uses and would continue to be subject to all applicable state or local water quality control plan or sustainable groundwater management plan. Therefore, the Proposed Project would result in no impacts related to implementation of a water quality control plan or sustainable groundwater management plan. No further analysis is needed.

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Physically divide an established community?

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 the development of new thoroughfares or highways, which would divide established communities.

The Proposed Project is a zone change to apply minimum lot standards for the development of additions or new commercial, mixed use and multi-family projects on the Subject Lots. The Proposed Project is also not anticipated to induce the specific construction of any particular residential, commercial or mixed-use development project. There is no commitment to any project-specific development. The Proposed Project would not disrupt, divide or isolate an existing neighborhood or community directly or indirectly. Therefore, the Proposed Project would result in no impacts related to land use. No further analysis is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. The Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy or regulation. The Proposed Project would support the vision and purpose of the adopted land use plans in a manner that is complimentary to the goals and policies of the West Adams – Baldwin Hills - Leimert Community Plan and the purposes of the Crenshaw Corridor Specific Plan:

West Adams – Baldwin Hills - Leimert Community Plan: Goals and Policies³⁵

³⁵ City of Los Angeles West Adams – Baldwin Hills Leimert Community Plan, <https://planning.lacity.org>, accessed October 28, 2019

- **Protect Neighborhoods:** Strive to protect existing single-family and low-density residential neighborhoods from encroachment by high-density residential and incompatible uses.

Crenshaw Corridor Specific Plan Purposes³⁶

- To provide standards for the Specific Plan area which will promote controlled development while encouraging and stimulating economic revitalization.
- To promote a compatible and harmonious relationship between residential and commercial development where commercial areas are contiguous to residential neighborhoods.
- To preserve and enhance community character and aesthetics by establishing coordinated and comprehensive standards for signs, buffering and setbacks, building and wall height, open space and lot coverage, parking and landscaping, as well as façade treatment and the conservation and preservation of existing resources, designated historic or otherwise, that shape the identity of the Crenshaw Corridor.

Thus, the Proposed Project would not conflict with applicable land use policies, zoning standards, or local, state, or federal policies. Therefore, the Proposed Project would result in no impacts related to land use consistency. No further analysis is required.

³⁶ City of Los Angeles Crenshaw Corridor Specific Plan, <https://planning.lacity.org>, accessed October 28, 2019

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

- a-b) No Impact.** According to the City’s General Plan Conservation Element, there are no portions of the Subject Lots that are designated as a mineral resource³⁷. The Proposed Project itself does not propose or authorize development or expand any land uses therefore, implementation of the Proposed Project would not result in the loss of availability of a statewide or a local mineral resource. The Proposed Project would result in no impact related to statewide or local mineral resources. No further analysis is required.

³⁷ City of Los Angeles General Plan, Conservation Element, Exhibit A Mineral Resources, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed October 28, 2019.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. 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 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 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 a zone change to apply minimum lot standards for the development of additions or new commercial, mixed use and multi-family projects on the Subject Lots. The Proposed Project is also not anticipated to induce the specific construction of any particular residential, commercial or mixed-use development project. The Proposed Project does not propose or authorize any specific 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, the Proposed Project would result in impacts less than significant related to noise. No further analysis is needed.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

No Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation. 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 bulldozer³⁸. 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 Proposed Project is limited to a zone change ordinance to apply minimum lot standards to existing additions and to future new construction projects involving commercial, mixed-use and multi-family uses on the Subject Lots. The Proposed Project does not propose or authorize any new operational uses, does not directly result in construction activities and is not expected to induce development. Therefore, the Proposed Project would result in no impacts related to excessive groundborne vibration or groundborne noise levels. No further analysis is required.

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

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels. The Subject Lots are not located within an airport land use plan, or the vicinity of a public airport or private airstrip. Additionally, the Proposed Project would result in no impacts related to airport noise levels. No further analysis is required.

³⁸ 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 October 28, 2019.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact may occur if a project were to locate new development such as homes, businesses or infrastructure, with the effect of substantially inducing unplanned growth that would otherwise not have occurred as rapidly or in as great a magnitude. The Proposed Project would not induce substantial population growth in an area either directly or indirectly. The Proposed Project is limited to a zone change ordinance to apply minimum lot standard requirements for additions to existing buildings and new construction of buildings for uses involving commercial, mixed-use and multi-family developments on the Subject Lots. The Proposed Project does not propose or authorize any development, does not expand the allowable land uses, nor does it intensify development or increase the density of the allowable uses resulting in substantial unplanned population growth. The Proposed Project does not offer any additional incentive or development regulation concessions such as increased density or increased height or reduced open space.

Aside from the proposed minimum lot standards, the existing zoning for the Subject Lots within the Project Area will remain C2 (Commercial). New development or construction as a result of the Proposed Project would be consistent with the existing zoning which includes State and local land use incentives. The Proposed Project is not expected to induce development and would not increase nor decrease the maximum density, FAR, height, or change any other regulation applicable to the Subject Lots other than minimum lot area. Any impacts related to population growth would not be a result of the Proposed Project. Therefore, the Proposed Project would

result in a less than significant impact related to unplanned population growth. No further analysis is needed.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Less Than Significant Impact. A significant impact may occur if a project would result in displacement of existing people or housing units, necessitating construction of replacement housing elsewhere. The Proposed Project would not displace substantial numbers of existing housing or people necessitating the construction of replacement housing elsewhere. The Proposed Project is limited to a zone change to apply minimum lot standards to additions of existing buildings and new construction of buildings involving commercial, mixed-use and multi-family uses on the Subject Lots. As the Proposed Project does not propose or authorize development, it would not displace substantial numbers of existing housing or people necessitating construction of replacement housing elsewhere. The Proposed Project does not intensify or change any land use and is not expected to induce development. Therefore, the Proposed Project would result in less than significant impacts.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The Los Angeles Fire Department (LAFD) is responsible for providing fire prevention, protection and emergency medical services to the Project Area. The Proposed Project does not propose or authorize development and does not induce development or alter existing development. The Proposed Project is limited to a zone change to apply minimum lot standards to additions of existing buildings and new construction of buildings involving commercial, mixed-use and multi-family uses on the Subject Lots. New development would be required to pay property taxes and assessments that go toward the City's General Fund, which is the LAFD's main source of funding. The monies generated from these activities would go toward improvements, maintenance, and addition of fire stations and resources as fire service demands increase. This revenue would be used to increase fire services to the area that includes the Subject Lots and throughout the City to ensure adequate service citywide. Furthermore, the LAFD would continue monitoring response times to develop educated estimates of future needs (personnel and equipment) in anticipation of new development.

Table 3, LAFD Fire Stations Serving the Project Area, provides the LAFD Fire stations within one mile of the Subject Lots. The Proposed Project would not result in substantial adverse impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of

which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. The Proposed Project would result in less than significant impacts related to fire protection. No further analysis is required.

Table 3: LAFD Fire Stations Serving the Project Area

Fire Station	Address	Type
Fire Station 66	1909 W. Slauson Avenue	Division HQ

b) Police protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective. The Los Angeles Police Department (LAPD) is responsible for providing police protection services to the Subject Lots. **Table 4, LAPD Police Stations Serving the Project Area**, provides the LAPD stations within close proximity to the Subject Lots. The Proposed Project would not directly induce population growth in the Project Area. The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on the Subject Lots. The Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. The Proposed Project would result in less than significant impacts related to police protection. No further analysis is required.

Table 4: LAPD Police Stations Serving the Project Area

Police Station Division Name	Address
77 th Street	7600 S. Broadway
Crenshaw Shopping Center Substation	3400 W Slauson Avenue

c) Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site. The Subject Lots are located within the boundaries of the Los Angeles Unified School District (LAUSD). The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on the Subject Lots. The Proposed Project would not introduce any new population into the area to require the construction of new or physically altered school facilities. Further, the Subject Lots are currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and afterschool programs. As for any future development, the Leroy F. Greene School Facilities Act of 1998 (“SB 50”) sets a

maximum level of fees a developer may be required to pay to address a project’s impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. As payment of appropriate school fees is required by law and is considered to fully address any impacts, the Proposed Project results in less than significant impacts. No further analysis is required. **Table 5, Schools Serving the Project Area** provides the schools closest to the Subject Lots.

Table 5: Schools Serving the Project Area

School Name	Address
Marvin Elementary School	2411 S Marvin Avenue
Angeles Mesa Elementary School	2611 W52nd Street
59 th Street Elementary School	2939 2 nd Avenue
Crenshaw High School	5010 11 th Avenue
Susan Miller Dorsey High School	3537 Farmdale Avenue
View Park Preparatory Accelerated Charter Middle School	5749 S. Crenshaw Boulevard
View Park Preparatory Accelerated Charter High School	5701 S. Crenshaw Boulevard

d) Parks?

Less Than Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (RAP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City. The RAP operates and maintains over 16,000 acres of parkland and 444 park sites³⁹. The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on Subject Lots . The Proposed Project does not propose or authorize any development and does not directly increase population on the Subject Lots. Therefore, the Proposed Project would result in less than significant impacts related to parks. No further analysis is required. **Table 6, Parks Serving the Project Area** provides the parks in close proximity to the Subject Lots.

Table 6: Parks Serving the Project Area

Park Name	Address
Van Ness Recreation Center	S. Van Ness Avenue and W. Slauson Avenue

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve a project, necessitating new or physically altered facilities – the construction of which could cause significant environmental impacts. A significant impact would occur if the

³⁹ Department of Recreation and Parks, <https://www.laparks.org/department/who-we-are>, accessed October 28, 2019

Proposed 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. The Los Angeles Public Library (LAPL) provides library services within the City of Los Angeles. LAPL provides services at the Central Library, 8 Regional Branch Libraries and 67 Community Branch Libraries and 4 bookmobiles.⁴⁰ The Proposed Project does not propose or authorize any development. The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on Subject Lots. There would be no substantial increase in population associated with the Proposed Project. Therefore, there would be no need for additional library resources or facilities to be constructed. Angeles Mesa Library (2700 W. 52nd Street) and Hyde Park Library (2205 W. Florence Avenue) are located within close proximity to the Subject Lots.

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to Los Angeles Public Libraries (LAPL) to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours, purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs. Library funding is now mandated under the City Charter to be funded from property taxes. Therefore, the Proposed Project results in less than significant impacts to library facilities. No further analysis is required.

⁴⁰

Los Angeles Public Library, Library Directory, https://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf, accessed October 28, 2019

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

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

a-b) Less Than Significant Impact. A significant impact would occur if a project results 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. A significant impact would also occur if a project includes or requires the construction of new or expansion of existing park facilities and such construction would have a significant adverse effect on the environment. The Proposed Project is limited to a zone change ordinance to adopt minimum lot standards for additions and new construction projects involving commercial, mixed-use and multi-family uses on the Subject Lots. The Proposed Project does not propose or authorize any development and is not expected to induce development or alter existing development that would affect existing neighborhood, regional or other recreational facilities. Therefore, the Proposed Project would result in less than significant impacts related to recreation. No further analysis is required.

XVII. TRANSPORTATION⁴¹

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

No Impact. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. The Proposed Project is limited to a zone change ordinance to adopt minimum lot standards for commercial, mixed-use and multi-family projects involving additions to existing buildings and new developments on the Subject Lots and does not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

The City of Los Angeles has adopted programs, plans, ordinances and policies that establish the transportation planning framework for all travel modes. The overall goals of these policies are to achieve a safe, accessible and sustainable transportation system for all users. The Circulation Element of the City's General Plan, the "Mobility Plan 2035," offers a comprehensive vision and set of policies and programs the City aims to achieve to provide streets that are safe and convenient for all users. Additionally, as one of 35 Community Plans that comprise the Land Use Element of the General Plan, the West Adams-Baldwin Hills-Leimert Community Plan also has

⁴¹ While the new VMT Transportation Thresholds have been adopted, this is in place as an option until July 1, 2020.

transportation-related goals, policies, and programs at the community level. The Department of Transportation's "Vision Zero Los Angeles" aims to reduce transportation fatalities to zero by using extensive crash data analysis to identify priority corridors and intersections and applying safety countermeasures.

The Proposed Project does not increase population or provide land use incentives that would increase the density, FAR or height of any of the Subject Lots. The Proposed Project does not propose or authorize any development and is not expected to generate significant traffic impacts, which would conflict with an applicable plan, ordinance or policy, related with traffic. Therefore, the Proposed Project would result in no impacts related to the circulation system. No further analysis is required.

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?

No Impact. A significant impact may occur if a project's vehicle miles traveled substantially increase compared to existing counts. The Proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). The Proposed Project is a zone change ordinance that would require additions to existing buildings and the construction of new buildings that involve commercial, mixed-use or multi-family uses to apply minimum lot standards for the Subject Lots. The Proposed Project does not propose or authorize any development. Aside from the proposed minimum lot standards for the Subject Lots, no other changes to zoning including density, height or FAR are proposed. The Subject Lots will remain zoned commercial (C2). No Vehicle Miles Traveled (VMT) would be generated from the Proposed Project that would otherwise occur from any new development. Therefore, the Proposed Project would result in no impacts related to any applicable congestion management plan. No further analysis is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. A significant impact may occur if a project includes new roadway design or introduces a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. No hazardous design features or incompatible land uses would be introduced with the Proposed Project that would create significant hazards to the surrounding roadways. The Proposed Project is limited to a zone change ordinance to adopt minimum lot standards for projects involving commercial, mixed-use and multi-family uses involving additions to existing buildings and new development for the Subject Lots. The Proposed Project does not propose or authorize any development project, thus no adverse effect would occur to local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. The Proposed Project would result in no impacts related to traffic hazards. No further analysis is required.

d) Result in inadequate emergency access?

No Impact. A significant impact may occur if a project design does not provide emergency access meeting the requirements of the Fire Department or in any other way threatens the ability of emergency vehicles to access and serve the project site or adjacent uses. The Proposed Project would not result in inadequate emergency access. The Proposed Project is the adoption of a zone change ordinance to apply minimum lot standards for new developments and additions to existing buildings that involve commercial, mixed-use and multi-family uses for the Subject Lots. The Proposed Project does not propose or authorize any development. The Proposed Project would not require the closure of any public or private streets, would not impede emergency vehicle access, not impede access to the City's designated disaster routes, and not impair the City's emergency response plan. Therefore, the Proposed Project would result in no impacts related to emergency access. No further analysis is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Less than Significant Impact. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. Assembly Bill 52 (“AB 52”), signed into law on September 25, 2014, requires lead agencies to evaluate a project’s potential to impact Tribal Cultural Resources (“TCR”, as defined in Public Resources Code §21074) and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR.

Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project. 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. The Tribe must respond in writing within 30 days of the City's AB 52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site. On October 18, 2019, AB52 Tribal Consultation Notice letters were mailed to the following California Native American Tribes via certified mail:

- Fernandeno Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

Four Tribes responded to the notification, two tribes, the Fernandeno Tataviam Band of Mission Indians and the San Fernando Band of Mission Indians deferred consultation to members of the Gabrielino Tribe, and the other two tribes, the Gabrielino Band of Mission Indians – Kizh Nation and Gabrielino Tongva Indians of California Tribal Council declined consultation. To date, no additional information and materials related to tribal cultural resources have been submitted.

The Proposed Project is limited to a zone change ordinance to adopt minimum lot regulations that apply to additions of existing buildings and new construction projects involving commercial, mixed-use and multi-family uses for the Subject Lots. The Proposed Project does not consist of any proposed development projects, includes no ground disturbing activity or any other related construction activity. The Proposed Project does not authorize development and is not expected to induce development. The Subject Lots are also not within the proximity of any known TCRs listed or eligible for listing in a state or local historical register. Any future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB 52 and conduct the necessary research and/or prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, the Proposed Project would result in no impacts related to tribal cultural resources. No further analysis is required.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site,

feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact. See response to Section XVIII (a) above. Further, any future development projects requiring a Negative Declaration, Mitigated Negative Declaration or an Environmental Impact Report will need to comply with AB 52 and conduct the necessary research and/or prepare the necessary reports to determine if the individual development project would cause a substantial adverse change in the significance of a tribal cultural resource. The Proposed Project includes no proposed development project, requires no ground disturbing or any other related construction activity, and does not induce development. Therefore, the Proposed Project results in less than significant impacts. No further analysis is required.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects. The Proposed Project does not propose or authorize any development project or construction activity. The Proposed Project does not intensify 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. Any future development projects at the Subject Lots would be reviewed on a case-by-case basis and would be subject to its own environmental review. Therefore, it is not reasonably foreseeable that the Proposed Project would increase the demand for water and the generation of wastewater, consequently increasing the demand of treatment facilities compared to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required. Additionally, implementation of the Proposed Project would not increase consumption of electrical power and natural gas such that existing supply facilities may need to be expanded or relocated. Similarly, telecommunications facilities would not need to be expanded or relocated as the Proposed Project itself does not propose or authorize development. Therefore, Proposed Project would result in less than significant impacts related to the reconstruction or construction or new or expanded utilities or service systems. No further analysis is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. As described in Section X, Hydrology and Water Quality, the Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. As the Subject Lots are located within the urban environment, it is likely that any future development project on the Subject Lots would be connected to the City's water line and serviced by LADWP. A significant impact would occur if LADWP was unable to provide water service to the Project Area. Water is supplied to the City from four primary sources, the Metropolitan Water District (MWD); the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct, local groundwater, and recycled water.⁴² The Proposed Project is limited to a zone change ordinance to adopt minimum lot standards for additions to existing buildings and new construction projects involving commercial, mixed-use and multi-family uses for the Subject Lots; and does not propose or authorize development. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Therefore, it is not reasonably foreseeable that there would be insufficient water supplies available to serve the area and future development on the Subject Lots during the normal, dry, and multiple dry years. The Proposed Project would result in less than significant impacts related to sufficient water supplies. No further analysis is needed.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. See response to Section XIX (a) above. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. Further, LADWP conducts water planning based on population growth forecast. The Proposed Project is not anticipated to induce population growth in the City as it does not propose or authorize any new development.

⁴²

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=18i8d8hpz1_21&_afLoop=430938015435485, accessed October 28, 2019.

The Proposed Project is limited to the adoption of a zone change ordinance to apply minimum lot standards for additions to existing buildings and new construction projects involving commercial, mixed-use and multi-family uses for the Subject Lots. The Proposed Project will not change the demand of water or wastewater treatment or affect the capacity of existing infrastructure to meet future demand. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Therefore, the Proposed Project would result in less than significant impacts related to wastewater treatment. No further analysis is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 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 for the Subject Lots. Any future construction activities that could reasonably be associated with development that occur 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 waste. However, the amount of waste created would not be substantial as the Proposed Project 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. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Therefore, the Proposed Project would result in less than significant impacts related to the capacity of local infrastructure, or other impair the attainment of solid waste reduction goals. No further analysis is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated onsite by the project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The Proposed Project does not propose or authorize any development project. The Proposed Project does not intensify or change any land uses and is not expected to induce development. Waste generated by individual development projects would be assessed on a case-by-case basis through the environmental review process. Individual development projects in the future would continue to be required to comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, the Proposed Project would result in less than significant impacts related to solid waste. No further analysis is required.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element, the Project Area is located along some designated disaster routes.⁴³

The Proposed Project does not propose or authorize development nor does it modify any existing regulations regarding permanent street closures, uses, intensities, or densities of development which may directly or indirectly impair an adopted emergency response plan or emergency evacuation plan. Further, future development that would occur on the Subject Lots would be

⁴³ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, pg. 61

confined to a site and during construction the proposed development project would need to comply construction management plans that would be implemented to ensure adequate circulation and emergency access. 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. Therefore, the Proposed Project itself would result in no impacts related to the City's implementation of its emergency response plans. No further analysis is needed.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. A significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire. As described in Section IX (g), the Subject Lots are not located in a Wildfire Hazard Severity Zone. Exposure to wildfire is generally identified to be the Very High Fire Hazard Severity Zone comprised mostly of hilly and mountainous regions of the City. The Subject Lots are located in a highly urbanized area that is generally flat. The Proposed Project does not propose or authorize any development. The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on Subject Lots. The Proposed Project does not intensify or change any land uses and is not expected to induce development or otherwise alter existing development, including in Wildfire Hazard Areas. Therefore, the Proposed Project would result in less than significant impacts. No further analysis is needed.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment. The Proposed Project does not propose or authorize development and it is not reasonably foreseeable that the Proposed Project would induce development. The Proposed Project is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on the Subject Lots. Therefore, the Proposed Project would result in no impacts that would require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. No further analysis is needed.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes. As discussed in Section IX (g) and Section XX (b) above, no portions of the Subject Lots are located within a City-designated Very High Fire Hazard Severity Zone and/or near a City-designated Fire Buffer

Zone. The Proposed Project does not propose or authorize development and is limited to a zone change ordinance to apply minimum lot standards for additions to existing buildings and new developments involving commercial, mixed-use and multi-family uses on Subject Lots. The Proposed Project 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. Any future development would be required to comply with all developmental regulations and City building codes with regard to fire safety and would not exacerbate the potential for fire in the Project Area. Therefore, the Proposed Project would result in less than significant impacts related to run-off, post-fire slope instability or drainage changes. No further analysis is needed.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. As discussed in Section IV, Biological Resources, the Proposed Project, does not propose or authorize any development. Future construction activities occurring as a result of the Proposed Project are not expected to impact any endangered fauna or flora and modify any special status species habitat. Due to the urbanized nature of the Subject Lots and the surrounding area, construction activities and operation of future development would not impact the habitat or population of the area around the Subject Lots. Additionally, the Proposed Project does not propose or authorize any new development in any identified Biological Resource Areas. The Proposed 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, the Project does not propose or authorize any development and future individual development projects. As such, the Proposed Project would not eliminate any important examples of the major periods of California history or prehistory. Any future individual development projects would be required to comply with existing state and local law, including any existing regulatory compliance measures that protect cultural resources. Therefore, the Proposed Project would result in no impacts. No further analysis is required.

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

No Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As the Proposed Project is intended to only address design standards and not change any existing land use designation, allowable density, height or FAR, there were no related projects in the project vicinity. The Proposed Project does not propose new development and is not expected to induce development. Based on the preceding discussions throughout this Initial Study, no significant impacts were identified for the 18 environmental factors analyzed above and none of the impacts identified as less than significant were determined to be cumulatively considerable. Additionally, as future development occurs on the Subject Lots, the Proposed Project will improve the design of future projects, support an active commercial corridor, and maintain compatibility with existing neighborhood character. For any future development proposed on the Subject Lots, compliance with federal state and local standards and regulations would reduce cumulative impacts to less-than-significant levels. The Proposed Project would not result in no impacts that are cumulatively considerable. No further analysis is required.

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

No Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts would result in less than significant or no impacts. Given compliance with existing laws and regulations, the Proposed Project would have no potential to result in substantial adverse impacts on human beings either directly or indirectly. Therefore, the Proposed Project would result in no impacts related to human health effects. No further analysis is required.