

6. SUSTAINABLE COMMUNITIES ENVIRONMENTAL IMPACT ANALYSIS

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix H to the State CEQA Guidelines, CCR Title 14, Chapter 3, 15000-15387) (refer to Section 5 [Initial Study Checklist]). The analytical methodology and thresholds of significance are based in part on the L.A. CEQA Thresholds Guide.

Pursuant to PRC Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of a transit priority project, other than those impacts that do not need to be reviewed pursuant to Section 21159.28, based on substantial evidence in light of the whole record. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs (refer to Section 4 [2016-2040 RTP/SCS Program EIR Mitigation Measures]).

1. AESTHETICS

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

The Project includes the development of two sites in Downtown Los Angeles. Site 1 development includes 222,574 square feet of mixed residential (382 dwelling units), philanthropic institution, and commercial retail land uses in two towers (Tower 1A and Tower 1B) and one level of subterranean parking garage with 32 vehicle parking spaces. Site 2 development includes 164,875 square feet of mixed-use residential (303 dwelling units) and commercial retail land uses in two buildings (Building 1 and Building 2) and 212 vehicle parking spaces in a parking garage. Extensive public bus and rail transit service is provided within the area of the Project Sites that provide regular service intervals of 15 minutes or less near the sites during the peak hours. Public bus transit service in the immediate Project study area

is currently provided by Metro, City of Gardena Transit, and City of Montebello bus lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.

On February 10, 2016, the City issued Zoning Information File No. 2452 to clarify the locations of transit priority areas within the City, which restate that aesthetic impacts shall not be considered a significant impact on the environment under the provisions of SB 743 (refer to Appendix D). Specifically, Zoning Information File No. 2452 states that impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact, as defined in the City's L.A. CEQA Thresholds Guide, shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA. A map of transit priority areas is attached to Zoning Information File No. 2452 in Appendix D. As shown on that map, and as confirmed by the City's Zone Information and Map Access System (ZIMAS) website, the Project Sites are located in a transit priority area.

Thus, the Project's aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, an assessment of the Project's potential aesthetics impacts is not required. However, an evaluation of aesthetics impacts is provided in Appendix D for **informational purposes only and not as an impact analysis**.

2. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Resource Protection indicates that the Project Sites are not included in the Important Farmland category.¹ Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts would occur.

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

No Impact. The Project Sites are zoned M2 (Light Industrial Zone) and located in the Central City Community Plan area. The General Plan land use designated for the Project Sites is Light Manufacturing. The Project Sites are not zoned for agricultural use, and the site is not under and is not eligible for enrollment under a Williamson Act Contract.² There are no Williamson Act Contracts in the City of Los Angeles. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract, and no impacts would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. The Project Sites do not include any forest or timberland and are not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are located in a developed area of the City and do not contain any forest land. Additionally, forest land is defined as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”³ Timberland is defined as “land...which is available for, and capable of, growing a

¹ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf>.*

² *Ibid.*

³ *California Public Resources Code Section 1222 [g].*

crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”⁴ There are a total of 20 trees located on the Project Sites (including 6 street trees). None of these trees or the level of tree coverage on the Project Sites are within the definitions of forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites and surrounding area are developed with urban land uses. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. No agricultural uses are located on the Project Sites or within the area. Therefore, no impacts related to this issue would occur.

Cumulative Impacts

Neither the Project Sites nor any of the related projects’ sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

3. AIR QUALITY

Introduction

The information and analysis in this section is based primarily on the following technical information, which is included in Appendix F:

- *Air Quality and Greenhouse Gas Emissions technical modeling results, DKA Planning April 2018.*

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as “criteria air pollutants,” are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O₃), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter ten microns or less in diameter (PM₁₀), particulate matter 2.5 microns or less in diameter (PM_{2.5}), and lead (P_b). The descriptions below of each criteria air pollutant and their health effects are based on information provided by the South Coast Air Quality Management District (SCAQMD).⁵

⁴ *California Public Resources Code Section 4526.*

⁵ *SCAQMD, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O₃). O₃ is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O₃ irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO₂). NO₂ is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_x is as a precursor to the formation of ozone.

Sulfur Dioxide (SO₂). Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM₁₀ and PM_{2.5}). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM₁₀), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (P_b). Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a

regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_x, as well as PM.

SO_x. Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H₂S). H₂S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H₂S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TACs can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular).

The California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified (or “listed”) as a TAC in California. A complete list of these substances is maintained on CARB’s website.⁶

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [μm]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 μm). Collectively, these particles have a large surface area that makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or “soot.” Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{7,8}

Volatile Organic Compounds

VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants. While there are no specific VOC ambient air quality standards, VOC is a prime component (along with NO_x) of the photochemical processes by which such criteria pollutants as ozone, nitrogen dioxide, and certain fine particles are formed. They are, thus, regulated as “precursors” to the formation of those criteria pollutants.

Regulatory Setting

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the USEPA is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other

⁶ CARB, *Toxic Air Contaminant Identification List*, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

⁷ CARB, *Overview: Diesel Exhaust and Health*, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.

⁸ CARB, *Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results*, March 2008.

requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions). The NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. These air pollutants are referred to as criteria pollutants. The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized on Table 6-1.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California (automobiles sold in California must meet stricter emission standards established by CARB). The USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, the USEPA introduced Tier 1 standards for equipment under 37 kilowatt (kW) (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through Tier 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment—similar to those required by the 2007 to 2010 standards for highway engines.

**Table 6-1
State and National Ambient Air Quality Standards and
Attainment Status for the South Coast Air Basin**

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	N/A ¹	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Attainment
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Unclassified/ Attainment
	1-hour	20 ppm (23 mg/m ³)	Attainment	35 ppm (40 mg/m ³)	Unclassified/ Attainment
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Unclassified/ Attainment
Sulfur Dioxide (SO ₂)	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Non-attainment

¹N/A = CARB has not determined 8-hour O₃ attainment status

Source: CARB, Ambient Air Quality Standards, and attainment status, 2018. (www.arb.ca.gov/desig/adm/adm.htm).

State

California Clean Air Act

In addition to being subject to the requirements of the federal CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, CCAA is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency (Cal-EPA) in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than

the corresponding federal standards and incorporate additional standards for sulfates, H₂S, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized on Table 6-1.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the South Coast Air Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}.

Toxic Air Contaminant Identification and Control Act

The public's exposure to TACs is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (i.e., DPM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. CARB approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art

technology requirements or emission standards to reduce DPM emissions. Breathing H₂S at levels above the state standard could result in exposure to a disagreeable rotten eggs odor. The state does not regulate other odors.

California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.⁹ In the risk identification step, as stated previously, CARB and OEHHA determine if a substance should be formally identified (or “listed”) as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.¹⁰ In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of DPM filters and encouraging the replacement of older, dirtier engines with newer emission controlled models. Implementation is staggered based on fleet size, with the largest operators beginning compliance in 2014.¹¹

Assembly Bill 2588 Air Toxics “Hot Spots” Program

The AB 1807 program is supplemented by the AB 2588 Air Toxics “Hot Spots” program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that

⁹ CARB, *California Air Toxics Program*, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.

¹⁰ CARB, *Toxic Air Contaminant Identification List*, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

¹¹ CARB, *In-Use Off-Road Diesel-Fueled Fleets Regulation*, www.arb.ca.gov/msprog/ordiesel/ordiesel.htm, last reviewed by CARB July 28, 2016.

pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective

The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports, etc.) that should be considered when siting sensitive land uses such as residences.¹² CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined “buffer zones.” If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional

South Coast Air Quality Management District

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the NAAQS and the CAAQS in the district. The SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The South Coast Air Basin portion of SCAQMD’s jurisdiction covers an area of 6,745 square miles. The South Coast Air Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Sites), Riverside, and San Bernardino counties. The South Coast Air Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

Programs that were developed by SCAQMD to attain and maintain the NAAQS and CAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain

¹² CARB, *Air Quality and Land Use Handbook, a Community Health Perspective*, April 2005.

mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

- Rule 401 Visible Emissions – This rule prohibits an air discharge that results in a plume that is dark or darker than what is designated as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance – This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or 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.”
- Rule 403 Fugitive Dust – This rule requires that future projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

Air Quality Management Plan

SCAQMD’s 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the South Coast Air Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate strategies for reducing NO_x emissions sufficiently to meet the upcoming ozone deadline standards.

Multiple Air Toxics Exposure Study IV

To date, the most comprehensive study on air toxics in the South Coast Air Basin is the Multiple Air Toxics Exposure Study IV (MATES-IV). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-IV found that the cancer risk in the region from carcinogenic air pollutants ranges from about 320 to 480 in a million. About 90 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating. The results indicate that DPM is the major contributor to air toxics risk, accounting on average for about 68 percent of the total risk.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities “conform” to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer with SCAQMD of the transportation strategy and transportation control measure sections of the AQMP for the South Coast Air Basin.

SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) on April 7, 2016.^{13 14} The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into SCAG’s 2012–2035 RTP/SCS. These foundational policies, which guided the development of the plan’s land use strategies, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;¹⁵
- Develop “Complete Communities”;
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

¹³ SCAG, *Final 2016–2040 RTP/SCS*.

¹⁴ CARB, *Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016*.

¹⁵ *Complete language: “Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment.” A more detailed description of these strategies and policies can be found on pp. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016–2040 RTP/SCS states that the SCAG region was home to about 18.3 million people in 2012 and included approximately 5.9 million homes and 7.4 million jobs.¹⁶ By 2040, the integrated growth forecast projects these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTAs) will account for 3 percent of regional total land but are projected to accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040.¹⁷ The 2016–2040 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability. As discussed further below, the Project Sites are located within an HQTA.

Local

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City’s General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City’s mobility and air quality goals. The Air Quality Element includes the following six key goals:

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

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

¹⁶ *The SCAG 2016–2040 RTP/SCS is based on year 2012 demographic data with growth forecasts developed for 2020, 2035, and 2040.*

¹⁷ *Defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors located within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.*

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

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

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

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

Clean Up Green Up Ordinance

The City adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. This ordinance added Sections 95.314.3 and 99.04.504.6 to the LAMC and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

Existing Conditions

South Coast Air Basin

The Project Sites are located within the South Coast Air Basin, named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. As noted above, the 6,745-square-mile South Coast Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the South Coast Air Basin are among the highest in the four counties comprising the South Coast Air Basin. USEPA has classified Los Angeles County as nonattainment areas for O₃, PM₁₀, PM_{2.5}, and Pb. This classification denotes that the South Coast Air Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the South Coast Air Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The air quality within the South Coast Air Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology¹⁸

The topography and climate of Southern California combine to make the South Coast Air Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer, which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions, which produce O₃ and the majority of particulate matter.

Local Climate

The mountains and hills within the South Coast Air Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Meteorological conditions at the Project Sites are best represented by meteorological data from the Los Angeles Downtown USC campus meteorological station, which is located 2.5 miles southwest of the Project Sites. The average wind speed in the vicinity of the Project Sites as recorded during the time period spanning 2012–2016 was 3.0 miles per hour. Wind direction in the vicinity of the Project Sites predominantly blows from the west and southwest.¹⁹

Climatological temperature and precipitation data spanning 1877 to 2016 is available from the Los Angeles Downtown USC Campus location. The averages represent a contemporary description of the climate in the region. According to the data, the annual mean temperature in the vicinity of the Project Sites was 64.9 degrees Fahrenheit (°F). The Project Sites and surrounding area experience a mean winter temperature of 58.0°F and a mean summer temperature of 71.5°F. Total precipitation at the Project Sites and in the surrounding area averages 14.8 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages 8.99 inches during the winter, 3.66 inches during the spring, 2.00 inches during the fall, and less than one inch during the summer.²⁰ These conditions are typical of temperate coastal climates.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRAs) throughout the South Coast Air Basin. The Project Sites are located in SCAQMD's Central Los Angeles receptor area (SRA 1). Historical data from the area was used to characterize existing conditions in the vicinity of the Project Sites. Table 6-2 shows pollutant levels, state, and federal standards, and the number of exceedances recorded in the area from 2014 through 2016. The one-hour State standard for O₃ was exceeded seven times during this three-year period, the daily State standard for PM₁₀ was exceeded 76 times, while the daily federal standard for PM_{2.5} was exceeded 15 times. CO and NO₂ levels did not exceed the CAAQS from 2014 to 2016.

¹⁸ AQMD, *Final Program Environmental Impact Report for the 2012 AQMP*, December 7, 2012.

¹⁹ SCAQMD, *Meteorological Data for AERMOD*, accessed March 25, 2018.

²⁰ Western Regional Climate Center, *local Climate Data Summaries for Western US*, accessed April 12, 2018.

Sensitive Receptors

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

**Table 6-2
2014-2016 Ambient Air Quality Data in the Vicinity of the Project Sites**

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	3.0	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0791	0.0647
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM ₁₀	Maximum 24-hour Concentration (µg/m ³)	87	88	67
	Days > 50 µg/m ³ (State 24-hour standard)	32	26	18
PM _{2.5}	Maximum 24-hour Concentration (µg/m ³)	0	56.4	44.39
	Days > 35 µg/m ³ (Federal 24-hour standard)	6	7	2
Sulfur Dioxide	Maximum 24-hour Concentration (ppb)	5.4	12.6	13.4
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
<i>Source: SCAQMD annual monitoring data http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed April 12, 2018.</i> <i>N/A: Not available at this monitoring station.</i>				

Given the Project Sites' location in Skid Row, there are a number of residential, transitional services, and health-related services that represent sensitive receptors, which include but are not limited to the following (refer to Figure 6-1):²¹

- 555 South San Pedro Street, apartments and the Central City Community Church, west of Site 1
- Weingart Center Association, 566 South San Pedro Street, apartments, directly south of and adjacent to Site 1.
- Union Rescue Mission; 545 South San Pedro Street, slightly northwest of Site 1.
- Emmanuel Baptist Rescue Mission; 530 East 5th Street, north of the Project Sites at the southwestern corner of East 5th Street and Crocker Street.
- Charles Cobb Apartments; 521 South San Pedro Street, northwest of Site 1.
- Midnight Mission; 601 South San Pedro Street, west of Site 2.
- 505 South San Pedro Street; Single Room Occupancy Housing Corporation, northwest of Site 1 at the southwest corner of 5th Street and South San Pedro Street.

The location of these sensitive receptors in relation to the Project Sites is shown on Figure 6-1.

²¹ *The "Skid Row" area of Downtown Los Angeles was defined in a decision in Jones v. City of Los Angeles (104 Cal. App. 2d 212 [1951]) as the area east of Main Street, south of 3rd Street, west of Alameda Street, and north of 7th Street, and contains a large population of homeless people.*



Figure 6-1
Location of Air Quality Sensitive Receptors
near the Project Sites

Existing Emissions from the Project Sites

Site 1 includes a 7,000 square-foot food service building and a surface parking lot. Site 2 includes a 133-space surface parking lot. Because the parking lots themselves do not generate vehicle traffic or emissions, the sole source of anthropogenic emissions is the food service building. The estimated emissions associated with the food service building is shown on Table 6-3.

Table 6-3
Estimated Existing Daily Emissions

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	<1	<1	9	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	<1	1	2	<1	<1	<1
Total Operations	<1	2	11	<1	<1	<1

Source: DKA Planning, 2018. Based on CalEEMod 2016.3.2 model runs. Refer to Appendix F.

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

Less Than Significant Impact. The discussion below addresses the Project's consistency with applicable SCAQMD and SCAG policies, including the SCAQMD's 2016 AQMP and growth projections within the SCAG 2016–2040 RTP/SCS. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following?
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the Project include air quality mitigation measures; or
 - To what extent is Project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been estimated for the Project. SO₂ emissions would be negligible during construction and

long-term operations and thus, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, VOCs are classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities and thus, the Project's PM₁₀ and PM_{2.5} emissions during construction were estimated in order to: (1) ascertain potential effects on localized concentrations, and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM₁₀ and PM_{2.5}. As demonstrated in the discussion and accompanying Tables 6-6 and 6-7 later in this section, the Project's generation of PM₁₀ and PM_{2.5} emissions during construction would not exceed the SCAQMD significance thresholds at the location of the sensitive receptors in proximity to the Project Sites.

Additionally, the Project's maximum potential NO_x and CO daily emissions during construction were estimated to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown by Tables 6-6 and 6-7, the Project's generation of NO_x and CO emissions would not exceed the SCAQMD localized significance thresholds. Therefore, the Project's construction-related localized air quality impacts would be less than significant.

Because the Project would not introduce any substantial stationary sources of emissions (e.g., industrial-type equipment associated with TACs), CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.²² As indicated in response to Checklist Question 3(d) discussed later in this section, no intersections would require a CO hotspot analysis, and associated impacts would be less than significant. Thus, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

As discussed below, an analysis of potential localized operational impacts from on-site activities was conducted. As demonstrated in the analysis below (refer to Table 6-10 later in this section), the Project's generation of localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational emissions would not exceed the SCAQMD's significance thresholds. Thus, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. Because the Project would not exceed any of the state and federal standards, the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with the 2016 AQMP growth assumptions, the projections in the 2016 AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and employment growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project

²² SCAQMD, *CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993*.

mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The discussion below provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if the project is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan, which serves as a comprehensive long-term plan for future development of the City, and SCAG's 2016-2040 RTP/SCS.

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area and are used by SCAG in all phases of implementation and review. Based on SCAG population projections in the 2016-2040 RTP/SCS, the City's projected 2017 population was 3,981,910.²³ In 2025 (Project buildout year), the City is anticipated to have a population of approximately 4,200,166 persons and in 2040, the City is anticipated to have a population of approximately 4,609,400 persons.²⁴

The Project includes the development of up to 685 new multi-family units, including 451 permanent supportive units, 225 individual/family units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.²⁵ Accordingly, assuming an approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.²⁶ It is probable that the remaining 533 future Project residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees. The Project's new residential population of 533 people would represent approximately 0.24 percent of the population growth forecasted by SCAG in the City between 2017 and 2025, and approximately 0.08 percent of the population growth forecasted by SCAG in the City between 2017 and 2040.

²³ The "baseline" year for the Project is 2017. The 2016-2040 RTP/SCS included a 2012 population for the City of approximately 3,845,500, with a projected 2040 population of approximately 4,609,400, for a straight-line average growth of approximately 27,282 people per year. Based on this, the estimated 2017 population for the City is 3,981,910.

²⁴ SCAG, 2016-2040 RTP/SCS.

²⁵ The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.

²⁶ $1,420 \text{ maximum residents} / 685 \text{ units} = 2.07 \text{ persons per unit}$.

The Project includes development of a combined total of 685 dwelling units at Sites 1 and 2. Based on the 2016–2040 RTP/SCS, the City had approximately 1,390,645 dwelling units in 2017. In 2025, the City is anticipated to have approximately 1,494,877 dwelling units, and in 2040, the City is anticipated to have approximately 1,690,300 dwelling units. Thus, the Project’s 685 dwelling units would constitute approximately 0.66 percent of the housing growth forecasted between 2017 and 2025 for the City, and constitute approximately 0.23 percent of the housing growth forecasted between 2017 and 2040 for the City.

Implementation of the Project also would result in approximately 74 employment positions on-site.²⁷ Based on the 2016–2040 RTP/SCS, the City employed 1,780,810 workers in 2017. In 2025, the City is anticipated to have approximately 1,915,866 employees, and in 2040, the City is anticipated to have approximately 1,915,866 workers. Thus, the Project’s estimated 74 employees would constitute approximately 0.06 percent of the employment growth forecasted between 2017 and 2025 for the City, and approximately 0.02 percent of the employment growth forecasted between 2017 and 2040 for the City.

Because the Project’s resulting residential, housing, and employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, the Project would be consistent with the projections in the AQMP. As such, the Project meets this AQMP consistency criterion.

- Does the project implement feasible air quality mitigation measures?

As discussed below in response to Checklist Questions 3(b), 3(c), and 3(d), the Project would not result in any significant air quality impacts, and no mitigation measures would be required. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD and the City, such as SCAQMD’s Rule 403, which includes measures to reduce the amount of fugitive PM₁₀ and PM_{2.5} emissions created by construction activities. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP’s air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate new residential, office, and retail commercial uses within a transit priority area and an HQTAs that is well served by multiple existing bus lines, and is proximate to existing rail service.

²⁷ Employment number provided by Project Applicant. Includes approximately 58 service staff and 16 management staff.

“Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

As stated previously, the AQMP applicable to the Project is the 2016 AQMP, which is the SCAQMD’s plan for improving regional air quality in the South Coast Air Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with state and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models and updates the federally approved 8-hour O₃ control plan with new commitments for short-term NO_x and VOC emissions reductions.

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in the analysis below, the Project would not result generate regional emissions in excess of SCAQMD’s significance thresholds. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the South Coast Air Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NO_x reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project implements the City and SCAQMD’s objectives of reducing VMT and related vehicular air emissions, as well as implementing various sustainability measures intended to further reduce Project-related emissions. Therefore, Project impacts related to consistency with the 2016 AQMP’s land use policies would be less than significant.

City of Los Angeles Policies

In addition to the Project’s consistency with the 2016 AQMP, as shown on Table 6-4, the Project would be consistent with the applicable policies of the City’s General Plan Air Quality Element. The Project would provide 444 long-term bicycle parking spaces and 49 short-term bicycle parking spaces and would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the existing land use pattern in the vicinity of the Project Sites that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Therefore, Project impacts related to consistency with the City’s General Plan Air Quality Element would be less than significant.

As shown on Table 6-4, the Project would be consistent with applicable policies of the General Plan's Air Quality Element. The Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

Table 6-4
Project Consistency with the City's General Plan Air Quality Element

Policies	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. As discussed later in this section, the Project would not generate construction-related regional or localized PM ₁₀ or PM _{2.5} emissions in excess of the SCAQMD's significance thresholds, and the Project's construction-related air quality impacts would be less than significant. Additionally, during the Project's construction phase, the Project Development would be required by the City to minimize particulate emissions during construction through application of best practices required under SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent. Roads and parking facilities within the Project Site area are paved. Additionally, during the Project's construction phase, the Project would be required by the City to minimize particulate emissions during construction through application of best practices required under SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project would be located in Downtown Los Angeles, an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes and Metro Rail stations. Additionally, the provision of a total of 49 short-term and 44 long-term bicycle parking spaces on the Project Sites would reduce the need for employees to drive a vehicle to the Project Sites.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	Consistent. The provision of a total of 49 short-term and 444 long-term bicycle parking spaces on the Project Sites would reduce the need for employees to drive a vehicle to the Project Sites. Additionally, the Project's location in a dense urban downtown area and the nature of Project as primarily serving the homeless population, who generally do not have vehicles, would further minimize single-occupancy driving.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. The provision of a total of 49 short-term and 444 long-term bicycle parking spaces on the Project Sites could reduce demand for auto parking. Additionally, the Project's location in a dense urban downtown area and the nature of Project as primarily serving the homeless population, who generally do not have vehicles, would further minimize single-occupancy driving.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the	Consistent. The Project is being entitled through the City, which coordinates with SCAG, Metro, and other

**Table 6-4
Project Consistency with the City's General Plan Air Quality Element**

Policies	Project Consistency
integration of land use, transportation, and air quality policies.	regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The City is the lead agency for the Project and has prepared this SCEA as part of the Project's review process.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project is an infill development that would provide housing and services to a homeless population currently living on the streets, thereby facilitating greater access to places of employment for the Project's residents.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes, including close proximity to bus routes and local rail service operated by Metro. Additionally, the Project would include a total of 49 short-term bicycle parking spaces and 444 long-term bicycle parking spaces.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including close proximity to bus routes and rail services operating by Metro. Additionally, the Project would include a total of 49 short-term bicycle parking spaces and 444 long-term bicycle parking spaces.
<i>Source: DKA Planning, 2018.</i>	

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

Less Than Significant Impact. The Project's grading and construction would result in short-term air pollutant emissions associated with construction worker vehicle trips, haul truck trips, stationary source emissions, and site grading. In addition, operational activities associated with the Project would generate long-term air pollutant emissions.

Construction

Construction-related emissions for the Project were estimated using SCAQMD's CalEEMod 2016.3.2 model using assumptions from the Project's developer. The Project would be constructed over three phases, as shown on Table 6-5.

**Table 6-5
Approximate Project Construction Schedule**

Phase	Duration	Notes
<i>Phase 1: Site 1 – Tower 1A</i>		
Demolition	Approximately 3 weeks	Demolition of approximately 18,360 square feet of asphalt parking lot
Grading	Approximately 2 week	10,244 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 1.5 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase.
<i>Phase 2: Site 1 – Tower 1B</i>		
Demolition	Approximately 1 month	Some overlap with the finishing (architectural coating) phase of Tower 1A. Demolition of approximately 4,870 cubic yards of material.
Grading	Approximately 2 weeks	4,800 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 1.5 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase. (Tower 1B becomes operational.)
<i>Site 2</i>		
Demolition	Approximately 1 month	Demolition of approximately 20,244 cubic yards of material.
Grading	Approximately 2 weeks	10,200 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 2 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase.
<i>Note: The approximate construction schedule assumes a 5-day workweek.</i>		

The Project would be required by the City to comply with the following regulations:

- SCAQMD Rule 403, reduces the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.

- SCAQMD Rule 1113, limits the VOC content of architectural coatings.
- SCAQMD Rule 402, states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials 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.
- In accordance with Section 2485 in Title 13 of the CCR, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Sites. Fugitive dust emissions would primarily result from grading activities. NO_x emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, and prevailing weather conditions.

As stated previously, it is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Sites, and maintaining effective cover over exposed areas. Compliance with Rule 403 reduces regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent.²⁸

As shown on Table 6-6, the construction of Site 1 would not produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions in excess of the SCAQMD's regional thresholds. It should be noted that these emissions conservatively assume the development of Towers 1A and 1B to include overlap of the initial stages of Tower 1B as construction of Tower 1A is finishing. Construction of Site 1 of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g.,

²⁸ SCAQMD, *Mitigation Measure Examples: Fugitive Dust from Construction and Demolition*, 2006.

ozone). Therefore, the Project's construction-related regional emissions impacts associated with development of Site 1 would be less than significant.

Table 6-6
Estimated Daily Construction Emissions – Site 1

Construction Phase Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2019	4	79	27	<1	7	3
2020	12	71	43	<1	9	4
2021	9	21	25	<1	3	2
2022	6	1	3	<1	<1	<1
Maximum Regional Total	12	79	43	<1	9	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	9	18	16	<1	1	1
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.</i>						

As shown on Table 6-7, the subsequent construction of Site 2 would not produce VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions in excess of the SCAQMD's regional thresholds. It should be noted that construction of this site would begin after construction of Site 1 is complete. Construction of Site 2 would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, the Project's construction-related regional emissions impacts associated with development of Site 2 would be less than significant.

Table 6-7
Estimated Daily Construction Emissions – Site 2

Construction Phase Year	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2022	8	83	79	<1	13	5
2023	7	18	23	<1	3	1
Maximum Regional Total	8	83	79	<1	13	5
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	8	17	14	<1	3	1
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
<i>Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.</i>						

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.²⁹ SCAQMD's Localized Thresholds (LSTs) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2014–2016) for the Project area.

Maximum on-site daily localized construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated for the Project using CalEEMod and were compared to the applicable SCAQMD LSTs for the Central LA SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which is the Weingart Association building, directly south of Site 1. The closest receptor distance on the SCAQMD mass rate LSTs look-up tables is 25 meters, which per SCAQMD guidance, is to be used for receptors located within 0 meters to 25 meters of the construction activities.

As shown on Tables 6-6 and 6-7, the Project would not produce emissions in excess of the SCAQMD's recommended localized standards of significance for NO₂ and CO at any part of the 49-month construction phase. Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACM) that address fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403, as required by the City. This would include watering portions of the sites that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, the Project's construction-related localized emissions impacts would be less than significant.

Operation

The Project would produce long-term emissions, primarily from motor vehicles associated with the Project. The Project could add up to approximately 2,038 net daily vehicle trips to and from the Project Sites on a weekday at the start of full operation of the Project in 2025.³⁰ The air quality analysis conservatively accounts for all daily trips as new emissions. As shown on Table 6-8, the Project's Site 1 operational emissions would not exceed SCAQMD's regional or localized significance thresholds.

²⁹ SCAQMD, *LST Methodology Appendix D-Mass Rate LST Look-up Table*, revised October 2009.

³⁰ Linscott, Law & Greenspan Engineers, *Traffic Impact Study – Weingart Projects*, March 2018.

Table 6-8
Estimated Daily Project Operations Emissions – Site 1

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	6	<1	32	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	2	9	25	<1	7	2
Total Operations	8	10	57	<1	8	2
Less Existing Operations	<1	-1	-2	<1	<1	<1
Net Regional Total	8	9	55	<1	8	2
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	6	<1	32	<1	<1	<1
Localized Significance Threshold	--	74	680	--	4	1
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

Similarly, as shown on Table 6-9, the Project's development of Site 2 would not produce pollutant emissions in excess of the SCAQMD's regional or localized significance thresholds.

Table 6-9
Estimated Daily Project Operations Emissions – Site 2

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	5	<1	32	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	2	6	20	<1	7	2
Total Operations	7	8	52	<1	7	2
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	5	1	32	<1	<1	<1
Localized Significance Threshold	--	74	680	--	4	1
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

As shown on Table 6-10, the aggregate pollutant emissions of the development of both Sites 1 and 2 would not exceed the SCAQMD's recommended thresholds of significance.

Table 6-10
Estimated Daily Project Operations Emissions – Sites 1 and 2

Emission Source	Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	11	<1	64	<1	<1	<1
Energy Sources	<1	2	<1	<1	<1	<1
Mobile Sources	4	15	45	<1	14	4
Total Operations	15	18	109	<1	15	7
Less Existing Operations	-<1	-1	-2	-<1	-<1	-<1
Net Regional Total	15	17	107	<1	15	7
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	11	2	64	<1	<1	<1
Localized Significance Threshold	--	74	680	--	4	1
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

For these reasons, the Project's operation-related regional and localized air quality impacts would be less than significant.

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

Less Than Significant Impact. SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.³¹ Individual projects that do not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As shown on Tables 6-6 and 6-7, the Project's daily construction emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative construction-related regional or localized emissions impacts would not be cumulatively considerable.

As shown on Tables 6-8, 6-9, and 6-10, the Project's daily operational emissions would not exceed any of the SCAQMD's regional or localized thresholds. Because the Project's pollutant emissions would not exceed the SCAQMD's operational thresholds of significance, the Project's contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable.

³¹ *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix E, p. D-3.*

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

Less Than Significant Impact. As discussed previously, sensitive receptors in the vicinity of the Project Sites include the following:

- 555 South San Pedro Street, apartments and the Central City Community Church, west of Site 1
- Weingart Center Association, 566 South San Pedro Street, apartments, directly south of and adjacent to Site 1.
- Union Rescue Mission; 545 South San Pedro Street, slightly northwest of Site 1.
- Emmanuel Baptist Rescue Mission; 530 East 5th Street, north of the Project Sites at the southwestern corner of East 5th Street and Crocker Street.
- Charles Cobb Apartments; 521 South San Pedro Street, northwest of Site 1.
- Midnight Mission; 601 South San Pedro Street, west of Site 2.
- 505 South San Pedro Street; Single Room Occupancy Housing Corporation, northwest of Site 1 at the southwest corner of 5th Street and South San Pedro Street.

Construction

Construction of a project could expose sensitive receptors to substantial pollutant concentrations, if a project's maximum daily emissions of regulated pollutants generated by sources located on and/or near a project site exceeded the applicable LSTs values presented in Tables 6-6 and 6-7, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. The LSTs values were derived by the SCAQMD for the criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5} to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown on Tables 6-6 and 6-7, during construction of the Project, maximum localized daily emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project Sites would not exceed any of the respective LST values. Thus, based on SCAQMD guidance, the Project's localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by the Project's construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Sites would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the

course of Project construction. Thus, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site residential locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 30-year lifetime will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 49 months, far shorter than a 30-year exposure timeframe and as discussed above, the magnitude of daily diesel PM emissions would not be sufficient to result in substantial pollutant concentrations. Accordingly, no residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, the Project’s construction-related impact on sensitive receptors would be less than significant.

Operation

As noted above, the Project would not produce operational pollutant emissions in excess of SCAQMD’s significance thresholds. In addition, the Project Sites would be developed with land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs occurring on-site (e.g., those resulting from typical use of cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program.

The primary sources of potential air toxics associated with Project operations include diesel PM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that a health risk assessment (HRA) be conducted for substantial individual sources of diesel PM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing such types of mobile source diesel emissions.³² Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of diesel PM warranting a HRA since daily truck trips to the Project Sites would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

³² SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2002.

Because the Project would not contain substantial sources of TACs and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, the Project's traffic-related emissions would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to area of the Project Sites. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, as discussed in response to Checklist Question 16(a), the Project would not result in any significant traffic impacts at any study intersection and thus, would not contribute to the levels of traffic congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.³³ For these reasons, the Project's operational-related air quality impacts on sensitive receptors would be less than significant.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Sites. The Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Construction of the Project would not cause an odor nuisance.

According to the SCAQMD CEQA Air Quality Handbook, 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. The Project's proposed land uses would not result in activities that create objectionable odors. Therefore, Project impacts related to odors would be less than significant.

Cumulative Impacts

Cumulative air quality impacts are discussed in response to Checklist Question 3(c). As discussed there, SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also would be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As the Project's emissions during construction and operation would not exceed any applicable significance threshold, the Project's contribution to any cumulative air quality impacts would not be considerable, and cumulative impacts related to air quality would be less than significant.

³³ Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

4. BIOLOGICAL RESOURCES

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

Less Than Significant Impact. The Project Sites are located in an urbanized and developed area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. However, there are 20 trees located on Site 1 and Site 2 (including 6 street trees), all of which are non-protected trees per the City's Tree Ordinance, would be removed as part of the Project (refer to the Tree Reports included in Appendix E). Additionally, 27 trees are located within the courtyard associated with the Weingart Association Center building to the south of Site 1, the site of the proposed transformer relocation. These trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site contains any riparian habitat or sensitive natural community. Development of the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site contains wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board under the Clean Water Act. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project Sites are located in an urbanized area of the City and are surrounded by existing development. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site is part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Sites that are used by migratory fish, and there are no wildlife nursery sites in the area. Also, as discussed previously, the Project would be required to comply with the MBTA, to reduce potential impacts to migratory bird species that could potentially nest in trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. In accordance with the LAMC Section 17.02 protected trees are defined as follows:

Any of the following Southern California native tree or shrub species:

- Oak tree 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*)
- California Bay (*Umbellularia californica*)
- Mexican Elderberry (*Sambucus Mexicana*)
- Toyon (*Heteromeles arbutifolia*)

As stated previously, a total of 20 trees are located on the Site 1 and Site 2 (including 6 street trees). Additionally, 27 trees are located within the courtyard associated with the Weingart Association Center building to the south of Site 1, the site of the proposed transformer relocation. These trees include the following:

- 7 Indian Laurel Fig (*Ficus nitida*)³⁴
- 6 Tipu Tree (*Tipuanan tipu*)
- 7 Apricot Tree (*Prunus armeniaca*)
- 3 Weeping Fig (*Ficus benjamina*)

³⁴ Six of these trees are street trees.

- 1 Tree of Heaven (*Ailanthus altissima*)
- 3 Canary Island Pine (*Pinus canariensis*)
- 9 Redbud Tree (*Cercis Canadensis*)
- 10 Australian Tea Tree (*Leptospermum laevigatum*)
- 1 Crape Myrtle (*Lagerstroemia indica*)

None of these trees are protected species as defined above (refer to the Tree Reports in Appendix E). The 20 trees (including the 6 street trees) associated with Site 1 and Site 2 would be removed during construction of the Project. Also, it is possible that all 27 trees in the courtyard (the site of the proposed transformer relocation) would be removed, although it is anticipated that fewer trees would be removed. However, for those trees removed from the Project Sites, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. For street trees that would be removed, the Project Applicant would be required to plant replacement street trees at a two-to-one ratio in accordance with the requirements of the City's Urban Forestry Division.

Prior to the removal of trees located within the public right-of-way, the Project Applicant would be required to obtain approval from the Board of Public Works for the removal and replacement of said trees. Street trees would be required to be removed and replaced as required by the Urban Forestry Division and the Board of Public Works. The landscape plans for the Project shall identify the all trees that would be removed. Compliance with the City's requirements would ensure no significant impacts related to biological resources, in particular trees, would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Sites, and neither site is subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.³⁵ There are no adopted conservation plans in the City. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan.

Cumulative Impacts

As discussed, 20 non-protected trees are located on the Project Sites (including 6 street trees); no other significant biological resources are located on the Project Sites. The Project Applicant would be required to plant replacement trees at and adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. All of the related projects listed on Table 2-2 in Section 2 (Project Description) are located in highly urban areas

³⁵ *City of Los Angeles General Plan Conservation Element, Exhibit B2.*

and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

5. CULTURAL RESOURCES

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

Less Than Significant Impact. The information and analysis of the Project’s potential impacts to historical resources is based primarily on the following (refer to Appendix G):

- *Historical Resources Memo, 554-562 South San Pedro Street, Los Angeles, CA, Jenna Snow, May 25, 2018 (revised August 3, 2018).*

No structures are currently located on Site 2, and no significant historical structures are located adjacent to Site 2. As such, this analysis focuses on potential impacts associated with Site 1 development.

Site 1 is currently developed with a 7,000-square-foot food service building and surface parking lot, which was constructed in 1922.³⁶ The building on Site 1 has not been previously surveyed; it was not included in the City’s citywide survey (SurveyLA), nor is it included in the Historic Property Data File for Los Angeles County, updated to 2011. Based on a site visit, review of building and alteration permits, and available information on the building’s history, the building on Site 1 has not been listed nor does it appear eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or as a local City of Los Angeles Historic Cultural Monument (HCM).

Site 1 is located adjacent to 511 East 6th Street, the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, and as a local HCM as “an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles’ central business district.” The El Rey Hotel is considered for the purposes of this analysis a historical resource under the California Environmental Quality Act (CEQA). As discussed in more detail below, Site 1 is located adjacent to the northern elevation, which is not the primary, street-facing elevation, of the El Rey Hotel, it does not appear that the Project would result in any direct or indirect impacts on the historical resource.

³⁶ *City of Los Angeles, Department of Building and Safety, Permit #27664, August 15, 1922.*

Historical Assessment of Site 1

Eligibility criteria for the National Register, California Register and local HCM generally align. Properties are eligible for designation if they meet one or more of the four criteria. The discussion below focuses on those aspects of the criteria relevant to evaluation of Site 1.

Criterion A/1/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

The Site 1 is located in what is described as “Central City East” in SurveyLA. The area has been known as “Skid Row” since the late nineteenth century. The following description of the area is excerpted from SurveyLA:³⁷

Central City East is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning a diverse area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the neighborhood contains a mix of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. Development in this area is of a notably lower scale than in other parts of the [Community Plan Area]....

Homelessness and other social problems were even more rampant in the area located to the east of Main Street and the Historic Core, which had become known as Los Angeles’ “Skid Row.” Since the late nineteenth century, this area had been the domain of an indigent population because of its abundance of residential hotels adjacent to early rail terminals. These hotels provided cheap, short-term accommodations and were accompanied by several missions that had long operated nearby to provide “a sermon and a cup of soup for the population of hard-drinking single men.” The area’s reputation as a bastion of urban disorder was solidified by a “policy of containment” that was adopted by the city in 1975, which sought to concentrate social service agencies and homeless individuals in an area bounded by 3rd, 7th, and Main Streets and Central Avenue. Despite the best efforts of social service organizations and not-for-profit agencies such as the Skid Row Housing Trust, which has converted thousands of dilapidated Single-Room Occupancy (SRO) hotel rooms in the area into affordable housing units, Skid Row continues to house one of the largest stable populations of homeless individuals in the United States.

The pattern of development described above of generally low-scale buildings that combine residential with industrial uses is evident in historic Sanborn Fire Insurance maps of the area.

As stated previously, the existing food service building on Site 1 was constructed in 1922. Since 1937, Site 1 has been owned by Ben Weingart; corporations controlled by Ben Weingart; one of his favorite

³⁷ *Architectural Resources Group, “Historic Resources Survey Report; Central City Community Plan Area,” prepared for the City of Los Angeles Department of City Planning, Office of Historic Resources, September 2016, 4 & 28-29.*

charities, Volunteers of America; or a foundation that bears his name, successively.³⁸ Table 6-11 shows a history of ownership.

**Table 6-11
History of Ownership**

Year	Owner
1922	Francesca W. Shepherd
1924	Security Trust & Savings Bank
1926	Title Insurance and Trust Company
1929	Citizens Trust and Savings Bank
1930	William H. Anderson
1936	Mortgage Guarantee Co.
1937	Consolidated Hotels, Inc.
1948	Ben Weingart
1957	Tragniew Inc
1980	Volunteers of America of Los Angeles
1984	Weingart Center Association
<i>Source: Jenna Snow, May 2018.</i>	

The building was divided into at least four spaces that were leased to different tenants. For a period of at least four years, the building was divided into five spaces. Table 6-12 lists tenants between 1925 and 1987.

Based on Table 6-12, most tenants were agents selling a variety of industrial products. However, it does not appear any of the products were produced at Site 1.

As a low-scale, one-story building housing a variety of agents selling industrial products, the food service building appears as a typical property type in the area, and it does not appear to have made any significant contributions to the broad patterns of development of the area. Thus, the building on Site 1 is not eligible for designation under criterion A/1/1.

Criterion B: Are associated with the lives of significant persons in our past.

Site 1, purchased by Ben Weingart in 1937, was one of many properties in his portfolio. Ben Weingart was a real estate developer who co-founded the community of Lakewood, as well as a major stockholder in the Fedmart discount department stores. Ben Weingart arrived in Los Angeles in 1911, initially delivered laundry on Skid Row and, soon thereafter, started purchasing boarding houses on Skid Row. Beginning in 1949, Weingart, in partnership with Louis Boyer and Mark Taper, purchased 3,500 acres south of Los Angeles, and built 17,000 new homes, along with the Lakewood Shopping Center.

³⁸ John Farrell, *Ben Weingart & Weingart Foundation, (Los Angeles, CA: Weingart Foundation, 2002), 137.*

Lakewood became the largest planned city in the United States.³⁹ The Weingart Foundation was founded in 1951 and has focused on “serv[ing] the underserved,” since that date.⁴⁰

**Table 6-12
Tenants Between 1925 and 1987**

Date	554 S. San Pedro	556 S. San Pedro	558 S. San Pedro	560 S. San Pedro	562 S. San Pedro
1925	William A. Winsboro Mfrs agent, h 1466 W 47th (1923 directory: Air Compressor & Equipment Co, 504 S San Pedro)	Don Lincoln, printer h 773 Cahuenga Ave		Stewart Electric Co. (Emmett A. Stewart) Jobbers and Distributors of Electrical Supplies	Lake View Creamery Co., W. F. Sperry, v-pres and mgr (1923 directory: 805 E 8th St
	JJ McBride				
1930	Murry Jacobs, HC Kimes dist mgr mfrs agts Jacobs Murray Co, manufacturing agents	Merco Nordstrom Valve Co		Edwin G Nelson (electrical equipment, manufacturers agent)	William Wahl Co (William and William Wahl Jr), wholesale beverages
1935	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer	Clinton H Smart (blue point supplies) h3522 Linda Vista ter	Far West Distributing Co, Charles Love manager new dealers	Cutler-Hammer, Inc (Electrical Equipment and supplies – Dealers)	JC Millett Co (winery supplies), Frank Kissling manager
	Robert L Whitham manufacturers agent (metals)				
1940	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer	Clinton H Smart (Olive C) CS [Christian Science pract[itioner] 610 S Bway R324 and engraves supplies and blue prints h914 S Kingsley dr	Abrasive Products Co A E MacAfee manager	Strickland & Davis (JM Strickland and JS Davis) manufacturers agents	Frank Kissling (Liquor Distributors)
	Robert L Whitham manufacturers agent (metals)				
1942	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer (Chicago Belting Co.)	Clinton H Smart (Olive C) CS pract 610 S Bway R324 and engravers supplies and blue prints Pasadenta		Strickland & Davis (JM Strickland and JS Davis) wholesale auto parts	Samuel Zane (candles)
1956		Smart Clinton H, Smart Supply Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1960	Leseco Metals and Supply	CC Lithograph Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1965	RA Schmitz	Midway Tool Supply		JJ Optics	Carroll Machinery

³⁹ Ted O. Thackery and Anne LaRiviere, “Ben Weingardt, 92, Philanthropist, Financier, Dies,” *Los Angeles Times*, December 23, 1980, A1.

⁴⁰ Weingart Foundation, “About Us: Foundation Overview,” www.weingartfnd.org/Foundation-Overview.

**Table 6-12
Tenants Between 1925 and 1987**

Date	554 S. San Pedro	556 S. San Pedro	558 S. San Pedro	560 S. San Pedro	562 S. San Pedro
1973	No Listings				
1987	Morrison's Management Service				
<i>Source: Jenna Snow, 2018.</i>					

None of the tenants have had an especially long tenure. The longest tenant was Clinton H. Smart, who provided blueprint and engraver supplies between 1935 and 1956. Clinton H. Smart was also listed in the directory as a Christian Science practitioner. His obituary notes that he was “president of a Los Angeles art supply company...a member of the Balboa Yacht Club and a director of the Christian Science Visiting Nurse Service.”⁴¹ While Clinton Smart appears to have been an upstanding citizen, he does not appear to be a significant person in our past.

In contrast, Frank Kissling does not appear to have been an upstanding citizen. Frank Kissling, who leased a space for liquor distribution in the late 1930s-1940, was arrested for smuggling alcohol from Mexico. In addition, he was accused of cutting the alcohol. In an article appearing the *Los Angeles Times*, “officials disclosed that the breaking of the smuggling case-biggest of its kind since prohibition days-had resulted in receipt of information that much of the smuggled alcohol was distributed in the Skid Row area here in refilled liquor bottles bearing fake labels. The original supply was ‘cut’ drastically in alcoholic content and sold as domestic bourbon with the aid of synthetic flavoring, it was reported.”⁴² Frank Kissling was later acquitted.⁴³

Established in 1914, J.W. Lewis Co. mostly sold and leased industrial spaces. With its main office located at the Security Building, at 510 South Spring Street, Site 1 was a satellite office for the company.⁴⁴ The company sold properties in the vicinity of Site 1, including the El Rey Hotel, located adjacent to Site 1, as well as a property on the southeast corner of 5th and South San Pedro Streets.⁴⁵ Max Elsner worked at J.W. Lewis Co. from as early as 1922.

Although Site 1 can be associated with several individuals, specifically Ben Weingart, Clinton Smart, Frank Kissling, and Max Elsner, Site 1 does not appear eligible under criterion B/2/2 for its association with the lives of significant persons in our past. While Ben Weingart was a significant person in Southern

⁴¹ “Obituary,” *Los Angeles Times*, October 18, 1957, B2.

⁴² “Inquiry Turns to Skid Row,” *Los Angeles Times*, July 28, 1939, A1.

⁴³ “Five Acquitted in Alcohol Case,” *Los Angeles Times*, November 4, 1939, A16.

⁴⁴ *California State Real Estate Division, Directory of Brokers and Salesmen, Volumes 3-4, (Sacramento: California State Printing Office, 1922).*

⁴⁵ “Sales in Wholesale Area,” *Los Angeles Times*, February 17, 1924, D8; “Classified Ad,” *Los Angeles Times*, May 7, 1950, A9.

California, Site 1 was one of his many property holdings and is not most closely associated with his important work. Neither Clinton Smart, Frank Kissling, nor Max Elsner appears to have been significant persons in our past.

Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Located on the east side of South San Pedro Street, Site 1 is bounded on the north by East 5th Street and the south by East 6th Street in the Skid Row area of Central City Community Plan Area of Los Angeles. The site contains one building that occupies approximately half of the parcel. A driveway at the north elevation separates the building from the parcel to the north, while a narrow walkway separates the building from the El Rey Hotel, which is located on the adjacent parcel to the south.

A one-story masonry building with no discernable architectural style, the one building on Site 1 has a flat roof with visible through-bolts at the parapet. The west façade, facing east toward South San Pedro Street, is five bays wide. Brick piers separate each bay. The main entrance is located in the second bay from the north, articulated by a contemporary canvas awning. The entrance is slightly inset at an angle and consists of a single, contemporary glass and metal door with a glass transom above. Three, tall, fixed sash windows are located adjacent to the main entrance above a low bulkhead. The center bay contains three, fixed, metal sash windows above a low bulkhead, flush with the infilled stucco. Three of the bays have been infilled with smooth stucco. The southern-most bay contains a contemporary tile mural and a secondary entrance. The secondary entrance is a contemporary, solid metal door. North and south side elevations are unarticulated and unadorned. The rear, east elevation has two entrances, a pair of metal doors toward the south side of the elevation and a single glass and metal door toward the north side of the elevation. The glass door is sided by a tall, fixed sash sidelight that is covered by a metal screen. A glass transom spans across the door and sidelight. It is also covered by a metal screen. A contemporary canvas awning spans the entrance and sidelight above the transom. A single window, covered by a metal screen, is located adjacent to the door. A number of additional openings along the elevation have been infilled.

The interior of the building functions as a café. The south half of the interior consists of one, large open space roughly divided by thin metal posts. A skylight is located toward the center of the space. The north half consists of a large commercial kitchen. All finishes on the interior, including floor tiles and suspended ceiling are contemporary.

Constructed in 1922, the one building on Site 1 has undergone substantial alterations. Table 6-13 lists all available alterations permits.

Figure 3 on page 7 of the Historical Resource Memo (refer to Appendix G) shows a historic image of the subject property from the 1940s. The building appears as an unremarkable one-story building with glass storefronts along the west façade. The first notable alteration occurred in 1952 with a “parapet correction.” It is difficult to determine in the historic image if the building ever had a decorative parapet. It is possible bays on the west façade were infilled in 1981, when the building changed use from stores to a café. Through bolts were likely installed as part of the Division 88 work, completed in 1988, which

required seismic stabilization of unreinforced masonry buildings. Finally, in 1995, substantial work was completed on the interior and most, if not all, interior features appear to date from this time.

As noted on Table 6-13, the building on Site 1 was designed by John Cooper. Born in Ohio, John Montgomery Cooper (1884-1950) graduated from Yale University and worked on the Panama Canal as an engineer. He arrived in Los Angeles in 1910. John Cooper was a noted southern California architect who was responsible for the design of the Hollywood Knickerbocker Hotel (1714 Ivar Avenue, 1929, contributing resource to a National Register-listed historic district), Grether & Grether Building (730 South Los Angeles Street, 1924, listed in the National Register), Roxie Theater (815 South Broadway, 1931, listed in the National Register), and NuWilshire Theater (1314 Wilshire Boulevard, Santa Monica, 1931, Santa Monica Landmark).

The building on Site 1 does not embody the distinctive characteristics of a type, period, or method of construction, nor does it possess high artistic values. The building has no discernible architectural style, nor does it appear that it ever was a high-style building. With the parapet removed and three of the five bays infilled, the building appears as a shell of how it originally looked. While the building was designed by John Cooper, a notable architect, this is not among his important work. Thus, Site 1 does not appear eligible for designation under criterion C/3/3.

Criterion D: Have yielded or may be likely to yield, information important in history or prehistory.

Site 1 cannot be reasonably expected to yield information important in prehistory or history. Thus, Site 1 is not eligible under Criterion D/4.

Site 1 is located adjacent to the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, as well as a local HCM. The survey found 511 East 6th Street eligible as “an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles’ central business district.” 566 South San Pedro Street is considered to be a historical resource under CEQA for purposes of this analysis.

Table 6-13
Alterations Permits

Date	Permit No.	Work	Owner	Architect/Builder	Valuation
8/15/1922	27664	New building	B*** H. Jones & Francis H. Green	John M. Cooper	\$15,000
1/31/1923	4641	Located at 554 So San Pedro. No alterations. Wish to install "wood" fixtures + office partitions of wood boards and sidings 8" high. Building is cement floor + walls brick." Building used for manufacturing + Jobing	J. W. Lewis Co., 518-519 Security Bldg	\$175	1/31/1923
4/16/1923	16774	"Put in partition above ice box- of wood and glass – ¼ glass"	Lakeview Creamery Co	Lake View Creamery Co, 562 S. San Pedro St	\$40
3/30/1937	9766	"1 Rope Pull Up Awning Complete"	Smart Supply Company, 556 S. San Pedro St.	A. Hoegee & Sons, Inc.	\$25
2/27/1940	6995	"To build open joist construction mezzanine for storage purposes only" (556 So. San Pedro Street)	Consolidated Hotels, El Rey Hotel 6th & San Pedro Sts	Arthur C. Munson	\$200
7/16/1942	8684	"one Rope awning complete"	The Smart Shop, 558 S. San Pedro St	D** of Soft Awning Co, 3103 So. Main St	\$35
4/25/1945	5683	Not legible. Bottom line: "to store blueprint paper"	Clinton Smart, 556 S. San Pedro	\$900	4/25/1945
8/13/1951	12905	"Recover existing awnings. Rope pull-up (retractable) (canvas covered)	Smart Supply Co., 556 So. San Pedro	\$104	8/13/1951
12/9/1952	48778	"parapet wall correction along S. San Pedro & alley" – 554-62 S. San Pedro, used as a store for 20 years	Consolidated Hotels, 1301 Wilshire	Lopez & Crecghton, 1257 E. 25 St	\$1100
1/11/1957	61747	"Enlarge Doors"- 562 S. San Pedro. Used as a machine shop	Consolidated Hotels, 1301 Wilshire Blvd	Kenneth Thompson	\$700
11/10/1964	81828	"Toilet rm add (interior)" – 554 S. San Pedro St. used as stores	Tragneiw Inc. 1301 Wilshire Blvd	\$800	11/10/1964
1/27/1981	35664	"1 story 34'x76' portion of existing 88'x84' office/warehouse converted to a kitchen (no assembly use)	Volunteers of America, 1501 Wilshire Blvd		
4/8/1983	61612	"Generator Cover Bldg" with chain link exterior walls, metal roof, concrete floor. 554-562 S. San Pedro	Volunteers of America, 1501 Wilshire Blvd	Stuart E. Greenfield, 2300 Westwood Blvd/	\$2500
7/26/1988	5144	"Division 88 Full Compliance," 554-62 S. San Pedro St., used as a kitchen & Dining room	Weingart Center Assn, 511 E. 6th St, LA, CA	Engineer – Wheeler & Gray, 7462 North Figueroa St	\$48,000
2/10/1995	3118	"interior modifications for café. Change of use to dining room & deli"	Weingart Center	Terry Downing, 31220 la Baga Dr., Ste 235, Westlake Village	\$85,000

Source: Jenna Snow, 2018.

The El Rey Hotel was constructed in 1925, designed by Charles F. Whittlesey with elements of Beaux Arts style.⁴⁶ Charles Frederick Whittlesey (1867-1941) started his professional career in Chicago, working as a draftsman for Louis Sullivan prior to opening his own practice. Around the turn of the twentieth century, Charles Whittlesey became chief architect for the Atchison Topeka and Santa Fe Railroad Company, working with noted architect Mary Colter. During that time, he designed the El Tovar Hotel at Grand Canyon National Park (1905) and Alvarado Hotel in Albuquerque, New Mexico (1904). Around the same time as he designed the El Rey Hotel, Charles Whittlesey was also responsible for the design of the Padre Hotel (1955 North Cahuenga Boulevard, 1925) and the Mayflower Hotel (now the Hilton Checkers Hotel, 535 South Grand Avenue, 1927).⁴⁷

When the hotel opened in 1927, it was operated by Stillwell Hotel Company and advertised for its “strictly fireproof” construction. Its 620 rooms were available for \$1.00 a day or \$5.00 to \$10.00 a week.⁴⁸ The hotel appears to have been one of the inexpensive, short-term accommodations common in this area. It appears in several newspaper articles as the site of tragic suicides.⁴⁹

The El Rey was one of the first hotels purchased by Ben Weingart in 1937, through a holding company named Consolidated Hotels Corporation.⁵⁰ The building transferred to the Weingart Foundation by 1980. When the Weingart Center opened in 1983, it was one of the first, and was the nation’s largest facility at the time providing housing and services for alcoholics on Skid Row. A one-million-dollar remodeling effort was completed prior to opening as a rehabilitation center.⁵¹ A new garden on the parcel east of the El Rey was dedicated in 2010 on the site of a formerly vacant lot.⁵² The garden is enclosed along East 6th Street by a contemporary concrete block wall and fence and consists of concrete and brick walkways, raised concrete planters, a central fountain, and a variety of seating.

While the exterior of the El Rey looks very similar to how it appeared historically in 1927, there is little historic fabric remaining on the interior apart from the circulation system. SurveyLA identified the subject property as appearing eligible under criterion A/1/1 as a 1920s hotel, as well as for its architecture under criterion C/3/3. Character-defining features of the exterior include the following:

⁴⁶ *City of Los Angeles, Department of Building and Safety, Permit #43928, December 31, 1925.*

⁴⁷ *Pacific Coast Architecture Database, “Charles Frederick Whittlesey,” PCAD id: 102, pcad.lib.washington.edu/person/102/; Los Angeles Conservancy, “Hilton Checkers,” www.laconservancy.org/locations/hilton-checkers.*

⁴⁸ *“Display Ad,” Los Angeles Times, June 12, 1927, 6.*

⁴⁹ *“Mystery Girl Takes Poison, Cuts Wrists,” Los Angeles Times, December 29, 1927, A12; “Photo,” Harold Examiner, USC Digital Library, 1951; “Man Threatens 12-Story Leap; Foiled by Police,” Los Angeles Times, April 9, 1964, 2.*

⁵⁰ *County of Los Angeles, Deed Books, Instrument No. 15323, Page 198.*

⁵¹ *“Alcoholism Center Gets New Owner, \$2-Million Grant,” Los Angeles Times, November 30, 1984, D1.*

⁵² *“Dedication of the Weingart Center Garden Project,” Press Release July 8, 2010, Congresswoman Lucille Roybal-Allard, <https://roybal-allard.house.gov/news/documentsingle.aspx?DocumentID=19800>.*

- Beaux Arts composition of a clearly delineated base-shaft-capitol composition
- Articulated corner column
- Arched bays at the ground floor
- Regularly spaced fenestration along the shaft
- Classical cornice details

The Project includes development of Site 1, adjacent to the north elevation of the El Rey Hotel. Specifically, the Project includes construction of two towers, designed in a contemporary style: one 12-stories facing South San Pedro Street and the other 18-stories high to the east. New mechanical equipment, including two new electrical transformers, is proposed to be located within the garden east of the El Rey Hotel and service the two new buildings as well as the El Rey Hotel. As the building on Site 1 does not meet any of the four criteria for listing in the National or California Registers or for local designation, it is not a historical resource under CEQA. Therefore, its demolition would not be a significant impact.

As the Project consists of new construction immediately adjacent to a historical resource, the El Rey Hotel, there is the potential for indirect impacts to the setting of the historical resources. In general, CEQA describes an *indirect* impact as one that results from the "...alteration of the resource or *its immediate surroundings* such that the significance of an historical resource would be materially impaired" (emphasis added - CEQA Guidelines §15064.5[b][1]). While the setting of the El Rey Hotel, including the garden to the east and its associated features, is not a character-defining feature and does not contribute to its significance, the proposed project nevertheless does not appear to impact its setting. The proposed project is located adjacent to the north elevation, a secondary elevation. The tower adjacent to the El Rey Hotel is proposed to be 12-stories tall, which is only two stories higher than the El Rey Hotel. It is interesting to note that at one time, a four-story building may have been contemplated for the subject property (refer to Figure 6 on page 9 of the Historical Resource Memo in Appendix G). Although the second tower would be almost twice as tall as the El Rey Hotel, it is not located immediately adjacent to it. Thus, the Project would not alter the setting of the El Rey Hotel, including the garden to the east that was dedicated in 2010, in such a manner that it would be materially impaired.

Based on this analysis, Project impacts related to historical resources would be less than significant.

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

Less Than Significant With Mitigation Incorporated. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Sites are located within an urbanized area of Downtown Los Angeles and have been subject to grading and development in the past. Based on a records search conducted by the South Central Coast Information Center (SCCIC), 4 archaeological sites have been recorded within a 0.5-mile radius of the

Project Sites. No archaeological sites and/or resources have been recorded at the Project Sites (refer to Appendix G). However, unknown buried remains of the Zanja Madre (a historical water conveyance system) could potentially fall within the boundaries of the Project Sites.⁵³ As such, it is possible that unknown archaeological resources could exist at the Project Sites. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface, and unknown archaeological resources could potentially be encountered during grading and excavation activities associated with development of the Project. Nonetheless, the Project Applicant would be required to implement Mitigation Measures CULT-MM-1 and CULT-MM-2, which would ensure that Project impacts related to unknown archaeological resources would be less than significant.

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

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Sites (refer to Appendix G). The records search revealed that no vertebrate fossil localities have been identified at the Project Sites. However, fossils have been found in the sedimentary deposits that exist within the Project Sites' area and at the Project Sites. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface. As such, there is a possibility for unknown paleontological resources to be encountered within the underlying alluvium during grading and excavation activities associated with development of the Project. Nonetheless, the Project Applicant would be required to implement Mitigation Measure 6-3, which would ensure that Project impacts related to unknown paleontological resources would be less than significant.

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

Less Than Significant Impact. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface. A significant adverse effect could occur if grading or excavation activities associated with a project could disturb human remains. However, no human remains are known to exist

⁵³ *Record Search Results for the Weingart Project, South Central Coast Information Center, December 4, 2017. Refer to Appendix G.*

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

Mitigation Measures (Cultural Resources)

- CULT-MM-1: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project Sites. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law.
- CULT-MM-2: Before ground disturbance, field observations regarding the geo-archaeological setting shall be conducted by a qualified archaeologist to determine the presence of undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. An archaeological monitor shall be present during initial excavation activities. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Department of City Planning and the Project Applicant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction.

CULT-MM-3: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Sites. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological and paleontological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and the related projects) that involves ground-disturbing activities is required to implement standard City conditions of approval and/or mitigation similar to Mitigation Measures CULT-MM-1 through CULT-MM-3 related to the discovery of archaeological resources, as well as existing state and City regulations related to discovery of paleontological resources and human remains. For these reasons, cumulative impacts related to archaeological and paleontological resources and human remains would not be cumulatively considerable and less than significant.

6. GEOLOGY AND SOILS

In 2015, the California Supreme Court in the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [Case No. S213478]) (CBIA v. BAAQMD), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users in the Central City Community Plan Area.

a) **Would the project exacerbate existing conditions so as to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**

(i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigations prepared for Sites 1 and 2, neither Project site is located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Sites.⁵⁴ The Hollywood Fault, located approximately 5.0 miles from the sites, is the closest fault with the potential for surface rupture. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Sites. Furthermore, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Sites, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to the compliance with the existing state and local regulations, including the 2016 California Building Code and the Los Angeles Building Code (LABC) and with the recommendations contained in the Final Geotechnical Reports prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety's

⁵⁴ *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Geotechnical Investigation (600 South San Pedro Street), GEOCON West, Inc., March 7, 2018. Both investigations are included in Appendix H.*

(LADBS) and the conditions contained within the LADBS Geology and Soils Approval Letters (Log Nos. 102203 and 102409), which would ensure the Project would be consistent with applicable seismic design criteria and with existing seismic safety regulations and would minimize potential impacts associated with rupture of a known fault or groundshaking.⁵⁵ Further, the LABC, with which the Project would be required to comply, contains construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Sites. No impacts with respect to fault rupture would occur.

(ii) Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Less Than Significant Impact. The Project Sites are located in a seismically active Southern California region. Known regional active faults that could produce significant ground shaking at the Project Sites include the Puente Hills Blind Thrust Fault, Hollywood Fault, the Raymond Fault, the Newport-Inglewood Fault Zone, the Verdugo Fault and the Whittier Fault located approximately 0.7, 5.0, 5.5, 6.4, 7.3 and 9.1 miles from the closest of the Project Sites, respectively. A partial list of moderate to major earthquakes that have occurred in Southern California in the last 100 years is shown on Table 6-14. The closest potentially active faults include the MacArthur Park Fault, the Coyote Pass Fault, the Overland Fault, and the Charnock Fault, located approximately 0.4, 2.4, 8.6, and 9.4 miles from the closest of the Project Sites, respectively. The Puente Hills Blind Thrust underlies the Project Sites, at a depth of approximately 0.7 miles.

Given the Project Sites' location in a seismically active region, the Project Sites could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code. The 2016 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. In addition, the Project would not exacerbate existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Sites. With compliance with regulatory requirements, Project impacts associated with seismic ground shaking would be less than significant.

⁵⁵ *The Geotechnical Investigations for the Projects have been reviewed by the Los Angeles Department of Building and Safety, which concurred with the conclusions and recommendations of the report. Refer to the LADBS approval letters in Appendix H.*

Table 6-14
List of Historic Earthquakes

Earthquake (Oldest to Youngest)	Date of Earthquake	Magnitude	Distance to Epicenter (Miles)	Direction to Epicenter
San Jacinto-Hemet area	April 21, 1918	6.8	74	ESE
Near Redlands	July 23, 1923	6.3	57	E
Long Beach	March 10, 1933	6.4	33	SE
Tehachapi	July 21, 1952	7.5	79	NW
San Fernando	February 9, 1971	6.6	27	NNW
Whittier Narrows	October 1, 1987	5.9	10	E
Sierra Madre	June 28, 1991	5.8	21	NE
Landers	June 28, 1992	7.3	104	E
Big Bear	June 28, 1992	6.4	82	E
Northridge	January 17, 1994	6.7	20	NW
Hector Mine	October 16, 1999	7.1	119	ESE
<i>Source: Geotechnical Investigation, GEOCON West, Inc., March 2018.</i>				

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

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

As discussed in the Geotechnical Investigations prepared for the Project Sites (refer to Appendix H), the State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle (California Department of Mines and Geology [CDMG²], 1999; CGS, 2016) indicates that the Project Sites are not located in an area designated as having a potential for liquefaction. In addition, a review of the County of Los Angeles Safety Element (Leighton, 1990) indicates that the sites are not located within an area identified as having a potential for liquefaction. The historic high groundwater level in the vicinity of the Project Sites is reported to be at a depth of approximately 85 feet beneath the existing ground surface for Site 1 and 90 to 95 feet beneath the existing ground surface for Site 2 (CDMG, 1998). Based on these considerations, the potential for liquefaction and associated ground deformations beneath the Project Sites is very low.

Construction of the Project would be subject to the City's current Building Code requirements, recommendations included in the Final Geotechnical Reports, and the conditions contained within the LADBS Geology and Soils Approval Letters (Log Nos. 102203 and 102409), which would minimize all potential impacts associated with liquefaction. As such and as stated previously, liquefaction potential for the Project Sites is considered low. Based on the above, development of the Project would not cause or

exacerbate geologic hazards, including liquefaction. Therefore, Project impacts related to liquefaction would be less than significant.

(iv) Landslides caused in whole or in part by the project's exacerbation of the existing environmental condition?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low shear strength, and increased water pressure. The Project Sites and adjacent properties are flat and do not contain any slopes or hillside areas.⁵⁶ The Project Sites are not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area (City of Los Angeles, 2017). The City of Los Angeles Safety Element indicates the site is not within an area identified as having a potential for slope instability or landslides. Thus, the Project would not result in any impacts related to landslides. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including landslides.

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

Less Than Significant Impact. The Project Sites are currently completely developed with impervious surfaces and do not contain any topsoil. During the Project's construction phase, activities such as excavation to depths of up to approximately 17 feet below ground surface (bgs), grading, and site preparation could leave soils at the Project Sites susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project Sites would be developed with impervious surfaces,

⁵⁶ *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Geotechnical Investigation (600 South San Pedro Street), GEOCON West, Inc., March 7, 2018. Both investigations are included in Appendix H.*

and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil, and impacts regarding soil erosion or the loss of topsoil would be less than significant.

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

Less Than Significant Impact. As discussed previously, liquefaction potential at the Project Sites is considered low. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Sites are not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Sites or in the general site vicinity. Thus, the potential for subsidence due to withdrawal of fluids or gases to adversely impact the sites is considered low.⁵⁷ The Geotechnical Investigations prepared for the Project (refer to Appendix H) include lateral earth pressure estimates to be considered in the design of the retaining structures that would be part of the Project building.⁵⁸ The Project Applicant would be required by the LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the site, including areas prone to geologic or soil instability. Through compliance with the LABC, recommendations included in the Final Geotechnical Reports, and the conditions contained within the LADBS's Geology and Soils Approval Letters (Log Nos. 102203 and 102409), impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards.

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

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Investigation prepared for Site 1, based on depth of the proposed subterranean level and granular nature of the site soils, the proposed structure would not be prone to the effects of expansive soils.⁵⁹ According to the Geotechnical Investigation prepared for Site 2, the upper 5 feet of existing site soils encountered as

⁵⁷ *Ibid.*

⁵⁸ *The Geotechnical Investigations for the Projects have been reviewed by the Los Angeles Department of Building and Safety, which concurred with the conclusions and recommendations of the report. Refer to the LADBS approval letters in Appendix H.*

⁵⁹ *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Refer to Appendix H.*

part of the investigation are considered to have a “low” expansive potential (EI = 0) and are classified as “non-expansive” based on the 2016 California Building Code Section 1803.5.3. Based on the depth of the proposed subterranean level on Site 1 (approximately 15 feet below ground surface) and granular nature of the site soils, the proposed building would not be prone to the effects of expansive soil. In addition, the Project would be designed and constructed in conformance with current LABC requirements. Thus, the Project would not be constructed on expansive soil and would not create a substantial risk to individuals and/or property. Based on the above, development of the Project would not cause or exacerbate geologic hazards. Therefore, no impacts related to expansive soils would occur as a result of the Project.

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

No Impact. The Project Sites are located within a community served by existing sewage infrastructure. The Project would connect to the City’s existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, Project cumulative geotechnical impacts related would be less than significant.

7. GREENHOUSE GAS EMISSIONS

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

Less Than Significant Impact. The information and analysis in this section is primarily based on the following (refer to Appendix F):

- *Air Quality and Greenhouse Gas Emissions technical modeling results, DKA Planning April 2018.*

Environmental Setting

Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the

amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), keep the average surface temperature of the Earth close to 60°F. Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.⁶⁰

In addition to CO₂, CH₄, and N₂O, GHG emissions include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), black carbon, and water vapor.⁶¹ CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHG emissions are less abundant but have higher global warming potential than CO₂. To account for this higher potential, emissions of other GHG emissions are frequently expressed in the equivalent of CO₂, denoted as CO₂e. CO₂e is a measurement used to account for the fact that different GHG emissions have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Table 6-15 presents the most common GHGs with their atmospheric residence times and associated GWP values.

Table 6-15
Global Warming Potentials for Selected Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	28
Nitrous Oxide (N ₂ O)	265
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbon (HFCs)	124-14,800
Sulfur Hexafluoride (SF ₆)	22,800
<i>Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.</i>	
<i>Source: SCAG, Draft Program EIR for 2016 RTP/SCS.</i>	

GHG emissions are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.) has contributed to a rapid increase in atmospheric levels of GHG emissions over the last 150 years. The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.2 degrees Celsius per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change

⁶⁰ California Environmental Protection Agency Climate Action Team, *Climate Action Report to Governor Schwarzenegger and the California Legislator*, March 2006.

⁶¹ Black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass.

modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG emissions concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century.⁶²

Adverse impacts from global climate change worldwide and in California include the following:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures;⁶³
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets;⁶⁴
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;⁶⁵
- Declining Sierra Mountains snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years;⁶⁶
- Increasing the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) in high ozone areas located in the Southern California area and the San Joaquin Valley by the end of the 21st Century;⁶⁷ and
- Increasing the potential for erosion of California's coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.⁶⁸

Scientific understanding of the fundamental processes responsible for global climate change improved over the past decade. However, there remain significant scientific uncertainties; for example, in

⁶² USEPA, *Draft Endangerment Finding*, 74 Fed. Reg. 18886, 18904, April 24, 2009.

⁶³ *Ibid.*

⁶⁴ *Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, Fifth Assessment Report*, ISBN 978 1 107 05799-1 Hardback; 978 1 66182-0 Paperback. 2013.

⁶⁵ *Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, Fifth Assessment Report*, ISBN 978 1 107 05799-1 Hardback; 978 1 66182-0 Paperback. 2013.

⁶⁶ *California Environmental Protection Agency Climate Action Team, Climate Action Report to Governor Schwarzenegger and the California Legislator*, March 2006.

⁶⁷ *Ibid.*

⁶⁸ *Ibid.*

predictions of local effects of climate change, occurrence of extreme weather events, and effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, volcanic activity, and changes in oceanic circulation. Due to the complexity of the climate system, the uncertainty surrounding the implications of climate change may never be completely eliminated. Because of these uncertainties, there continues to be significant debate as to the extent to which increased concentrations of GHG emissions have caused or will cause climate change, and with respect to the appropriate actions to limit and/or respond to climate change. Given the scale over which climate change occurs, as well as the uncertainties described above, it is not possible to link specific development projects to future specific climate change impacts; though estimating project-specific emissions is possible.

CARB has prepared a statewide emissions inventory covering 2000 to 2014, which demonstrates that GHG emissions have decreased by 7.9 percent over that period.⁶⁹ Emissions in 2014 from the transportation sector, which represents California's largest source of GHG emissions and contributed 37 percent of total annual emissions, declined marginally relative to 2011 while the economy and population continued to grow over that three year time period.⁷⁰ The long-term direction of transportation-related GHG emissions is another clear trend, with a 13 percent drop over the past ten years.

Table 6-16 shows GHG emissions from 2010 to 2014 in California. As noted, the majority of the statewide emissions are transportation related. Other direct sources of emissions include electricity generation, industrial uses, and to a lesser extent, solid waste decomposition, haul trucks, and the use of refrigerant compounds.

Table 6-16
California Greenhouse Gas Emissions Inventory

Sector	Annual CO ₂ e Emissions (million metric tons)				
	2010	2011	2012	2013	2014
Transportation	163	159	159	158	160
Industrial	91	91	91	93	93
Electric Power	90	88	95	90	88
Commercial and Residential	45	45	43	43	38
Agriculture	35	36	37	35	36
High Global Warming Potential	12	14	15	16	17
Recycling and Waste	9	9	9	9	9
Emissions Total	445	442	449	444	441

Source: CARB, California Greenhouse Gas Inventory 2000-2014, October 18, 2016.

⁶⁹ CARB, *California Greenhouse Gas Inventory 2000-2014, March 30, 2016.*

⁷⁰ *Ibid.*

Regulatory Framework

International

U.S.–China Climate Agreement

In November 2014, the United States (U.S.) and China made a joint announcement to cooperate on combating climate change and promoting clean energy. In the U.S., President Barack Obama announced a climate target to reduce GHG emissions by 26 to 28 percent below 2005 levels by 2025. In China, President Xi Jinping announced a climate target to reduce peak CO₂ emissions by 2030 and to increase the renewable energy share across all sectors to 20 percent by 2030. China will need to build an additional 800 to 1,000 gigawatts of nuclear, wind, solar, and other zero emission generation capacity by 2030 to reach this target. Together, the U.S. and China have agreed to: expand joint clean energy research and development at the U.S.-China Clean Energy Research Center (CERC); advance major carbon capture; use and storage demonstrations; enhance cooperation on HFCs; launch a climate-smart/low-carbon cities initiative; promote trade in green goods; and demonstrate clean energy on the ground.⁷¹

Paris United Nations Framework Convention on Climate Change

A new international climate change agreement was adopted at the Paris United Nations Framework Convention on Climate Change climate conference in December 2015. The last two climate conferences in Warsaw (2013) and Lima (2014) decided that countries were to submit their proposed emissions reduction targets for the 2015 conference as “intended nationally determined contributions” prior to the Paris conference. The European Union has committed to an economy-wide, domestic GHG reduction target of 40 percent below 1990 levels by 2030. The U.S. has set its intended nationally determined contribution to reduce its GHG emissions by 26 to 28 percent below its 2005 level in 2025 and to make best efforts to reduce its emissions by 28 percent. These targets are set with the goal of limiting global temperature rise to well below 2.0 degrees Celsius and getting to the 80 percent emission reduction by 2050.

North American Climate, Clean Energy, and Environment Partnership Action Plan

The North American Climate, Clean Energy, and Environment Partnership Action Plan was announced by Prime Minister Justin Trudeau, President Barack Obama, and President Enrique Peña Nieto on June 29, 2016, at the North American Leaders Summit in Ottawa, Canada.⁷² This action plan identifies the deliverables to be achieved and activities to be pursued by the three countries as part of this enduring Partnership. The three leaders declared their common vision in a historic North American Climate, Clean Energy, and Environment Partnership, described in a Leaders’ Statement and Action Plan that details the actions our leaders will pursue. These actions include the following:

⁷¹ *The White House, Fact Sheet: U.S.-China Joint Announcement on Climate Change and Clean Energy Cooperation, November 11, 2014.*

⁷² *The White House, Fact Sheet: United States Key Deliverables for the 2016 North American Leaders’ Summit, June 29, 2016.*

- Setting a target to increase clean power to 50 percent of the electricity generated across North America by 2025.
- Reducing methane emissions from the oil and gas sector by 40 to 45 percent by 2025.
- Strengthening standards for energy efficiency and vehicle emissions, including aligning energy efficiency standards that will amount to over \$4 billion per year in annual savings for United States businesses and consumers by 2025.
- Strengthening vehicle efficiency, improving fuel quality, and reducing tailpipe pollutants.
- Affirming their support for joining and implementing the Paris Agreement this year and committing to work together to address climate issues through the Montreal Protocol, International Civil Aviation Organization, G-20, and other forums.
- Celebrating our strong environmental cooperation, including expanding cooperation on early warning systems for natural disasters, supporting habitat for migratory species including Monarchs and birds, and developing action plans to combat wildlife trafficking.

Federal

Supreme Court Ruling

The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S. Ct. 1438 (2007), that CO₂ and other GHG emissions are pollutants under the Clean Air Act (CAA), which the United States Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. On December 7, 2009, the USEPA Administrator made two distinct findings: 1) the current and projected concentrations of the six key GHG emissions in the atmosphere (i.e., CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) threaten the public health and welfare of current and future generations; and 2) the combined emissions of these GHG emissions from motor vehicle engines contribute to GHG emissions pollution, which threatens public health and welfare.

On June 23, 2014, the U.S. Supreme Court ruled in *Utility Air Regulatory Group v. EPA* that the USEPA exceeded its statutory authority under the CAA when it determined that stationary source emissions of GHGs would trigger permitting obligations under the Prevention of Significant Deterioration (PSD) program and Title V of the CAA. However, the court upheld those portions of USEPA's rulemaking that require a source to apply best available control technology (BACT) to GHG emissions where the source would otherwise trigger PSD permitting on account of its emissions of other pollutants. The Supreme Court's decision was limited to USEPA's regulation of GHG emissions under the PSD and Title V provisions of the CAA, and it left unanswered other questions regarding USEPA's permitting and BACT authority under the PSD program, and the USEPA's efforts to regulate GHG emissions from stationary sources.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. First, this act sets a Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel by 2022.⁷³ Second, this act increases Corporate Average Fuel Economy Standards to require a minimum average fuel economy of 35 miles per gallon for the combined fleet of cars and light trucks by 2020. Third, this act includes a variety of new standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

National Fuel Efficiency Policy

On May 19, 2009, President Barack Obama announced a new National Fuel Efficiency Policy aimed at increasing fuel economy and reducing GHG emissions pollution.⁷⁴ This policy is expected to increase fuel economy by more than five percent by requiring a fleetwide average of 35.5 miles per gallon by 2016 starting with model year 2012. On September 15, 2009, the USEPA and the Department of Transportation's (DOT) National Highway Traffic Safety Administration (NHTSA) issued a joint proposal to establish a national program consisting of new standards for model year 2012 through 2016 light-duty vehicles that will reduce GHG emissions and improve fuel economy. The proposed standards were phased in and required passenger cars and light-duty trucks to comply with a declining emissions standard. By 2016, vehicles were to meet an average standard of 250 grams of CO₂ per mile and 35.5 miles per gallon.⁷⁵ The final standards were adopted by the USEPA and the DOT on April 1, 2010. On December 7, 2009, the USEPA Administrator signed the following two distinct findings regarding GHG emissions under Section 202(a) of the CAA (42 United States Code Section 7521):

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed GHG emissions (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHG emissions from new motor vehicles and new motor vehicle engines contribute to the GHG emissions pollution that threatens public health and welfare.

While these findings do not impose additional requirements on industry or other entities, this action is a prerequisite to finalizing the USEPA's proposed GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the NHTSA.

⁷³ According to the United States Energy Information Administration, 36 billion gallons of fuel represents approximately 26 percent of current gasoline consumption.

⁷⁴ The White House, Office of the Press Secretary, http://www.whitehouse.gov/the_press_office/President-Obama-Announces-National-Fuel-Efficiency-Policy/, May 19, 2009.

⁷⁵ USEPA, EPA and NHTSA Propose Historic Nation Program, 2009.

Executive Order 13693

Published in June 10, 2015, the goal of Executive Order (E.O.) 13693, Planning for Federal Sustainability in the Next Decade, is to maintain federal leadership in sustainability and GHG emissions reductions. The E.O. outlines forward-looking goals for federal agencies in the area of energy, climate change, water use, vehicle fleets, construction, and acquisition. Federal agencies shall implement the following, where life-cycle cost-effective, beginning in 2016:

- Reduce agency building energy intensity as measured in British Thermal Units (BTUs) per square foot by 2.5 percent annually through 2025;
- Improve data center energy efficiency at agency buildings;
- Ensure a minimum percentage of total building electric and thermal energy shall be from clean energy sources;
- Improve agency water use efficiency and management (including storm water management); and
- Improve agency fleet and vehicle efficiency and management by achieving minimum percentage GHG emissions reductions.

*State**California's Energy Efficiency Standards for Residential and Nonresidential Buildings*

Located in Title 24, Part 6, of the California Code of Regulations (CCR) and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.⁷⁶ The California Energy Commission adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of Assembly Bill (AB) 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The most recent update to Title 24 is the 2016 Building Energy Efficiency Standards, which improve on the 2013 Building Energy Efficiency Standards for new construction of and additions and alterations to residential and nonresidential buildings. The 2016 Building Energy Efficiency Standards went into effect on July 1, 2017.

Assembly Bill 1493 (Pavley I)

AB 1493 (referred to as Pavley I), adopted in 2002, required CARB to develop and adopt standards for vehicle manufacturers to reduce GHG emissions coming from passenger vehicles and light-duty trucks at a "maximum feasible and cost effective reduction" by January 1, 2005. Pavley I took effect for model years starting in 2009 and extending to 2016, and CARB's Low Emission Vehicle (LEV) III Program will

⁷⁶ *California Energy Commission, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations.*

cover 2017 to 2025. It is estimated that these standards will reduce climate change emissions from the vehicle fleet by 30 percent in 2016 compared to the emissions in the same year without the standards.⁷⁷

Senate Bill 1078, Senate Bill 107, and E.O. S-14-08 (Renewables Portfolio Standard)

Signed on September 12, 2002, State Bill (SB) 1078 required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107, signed on September 26, 2006 changed the due date for this goal from 2017 to 2010, and was achieved by the State. On November 17, 2008, E.O. S-14-08 established a Renewables Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Increased use of renewable energy sources will decrease California's reliance on fossil fuels, reducing GHG emissions from the energy sector.

E.O. S-3-05

On June 1, 2005, Governor Schwarzenegger issued E.O. S-3-05, which set the following GHG emissions reduction targets:

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

E.O. S-3-05 calls for the Secretary of California Environmental Protection Agency (Cal-EPA) to be responsible for coordination of state agencies and progress reporting. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major “decarbonization” of electricity supplies and fuels, and major improvements in energy efficiency.⁷⁸

In response to the E.O. S-3-05, the Secretary of the Cal-EPA created the Climate Action Team (CAT). California's CAT originated as a coordinating council and included the Secretaries of the Natural Resources Agency, and the Department of Food and Agriculture, and the Chairs of CARB, Energy Commission, and the California Public Utilities Commission (CPUC). The original council was an informal collaboration between the agencies to develop potential mechanisms for reductions in GHG emissions in California. The original mandate for the CAT was to develop proposed measures to meet the emission reduction targets set forth in E.O. S-3-05. The CAT expanded and has members from 18 state agencies and departments. The CAT also has ten working groups that coordinate policies among their members. The working groups and their major areas of focus are as follows:

- Agriculture: Focusing on opportunities for agriculture to reduce GHG emissions through efficiency improvements and alternative energy projects, while adapting agricultural systems to climate change;

⁷⁷ CARB, *Clean Air Standards - Pavley, Assembly Bill 1493, May 6, 2013.*

⁷⁸ California Energy Commission, *California's Energy Future – The View to 2050, May 2011.*

- Biodiversity: Designing policies to protect species and natural habitats from the effects of climate change;
- Energy: Reducing GHG emissions through extensive energy efficiency policies and renewable energy generation;
- Forestry: Coupling GHG emissions reduction mitigation efforts with climate change adaptation related to forest preservation and resilience, waste to energy programs and forest offset protocols;
- Land Use and Infrastructure: Linking land use and infrastructure planning to efforts to reduce GHG emissions from vehicles and adaptation to changing climatic conditions;
- Oceans and Coastal: Evaluating the effects of sea level rise and changes in coastal storm patterns on human and natural systems in California;
- Public Health: Evaluating the effects of GHG emissions reduction mitigation policies on public health and adapting public health systems to cope with changing climatic conditions;
- Research: Coordinating research concerning impacts of and responses to climate change in California;
- State Government: Evaluating and implementing strategies to reduce GHG emissions resulting from state government operations; and
- Water: Reducing GHG emissions impacts associated with the state's water systems and exploring strategies to protect water distribution and flood protection infrastructure.

The CAT is responsible for preparing reports that summarize the state's progress in reducing GHG emissions. The most recent CAT Report was published in December 2010. The CAT Report discusses mitigation and adaptation strategies, state research programs, policy development, and future efforts.

SB 1 and SB 1017 (Million Solar Roofs Program)

SB 1 and SB 1017, enacted in August 2006, set a goal to install 3,000 megawatts of new solar capacity by 2017 - moving the state toward a cleaner energy future and helping lower the cost of solar systems for consumers. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time. It provides up to \$3.3 billion in financial incentives that decline over time.

AB 32

In September 2006, the California Global Warming Solutions Act of 2006, also known as AB 32, was signed into law. AB 32 focuses on reducing GHG emissions in California, and requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. CARB initially determined that the total statewide aggregated 1990 GHG emissions level and 2020

emissions limit was 427 million metric tons of carbon dioxide equivalent (CO₂e). The 2020 target reduction was estimated to be 174 million metric tons of CO₂e. To achieve the goal, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. SB 1368, a companion bill to AB 32, requires the CPUC and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.⁷⁹ On October 25, 2007, CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs emissions from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing SF₆ emissions from the non-electricity sector.

CARBS AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the CAT and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state economy. The GHG emissions reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

Key approaches for reducing GHG emissions to 1990 levels by 2020 include the following:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable electricity standard of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related GHG emissions for regions throughout the state, and pursuing policies and incentives to achieve those targets; and

⁷⁹ CARB, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

- Adopting and implementing measures to reduce transportation sector emissions.

CARB adopted the First Update to the AB 32 Scoping Plan in 2014.⁸⁰ The First Update identified next steps for California's leadership on climate change. It describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020. Specifically, the First Update covers a range of topics, including the following:

- An update of the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants.
- A review of progress-to-date, including an update of Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California.
- Potential technologically feasible and cost-effective actions to further reduce GHG emissions by 2020.
- Recommendations for establishing a mid-term emissions limit that aligns with the state's long-term goal of an emissions limit 80 percent below 1990 levels by 2050.
- Sector-specific discussions covering issues, technologies, needs, and ongoing state activities to significantly reduce emissions throughout California's economy through 2050.

The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.⁸¹

SB 1368

SB 1368, adopted September 19, 2006, directs the California Energy Commission and the CPUC to adopt a performance standard for GHG emissions for the future electricity used in California, regardless of whether it is generated in-state or purchased from other states.

E.O. S-1-07, the Low Carbon Fuel Standard

On January 18, 2007, E.O. S-1-07 was issued requiring a reduction of at least ten percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the Low Carbon Fuel Standard are CARB's responsibility. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in CARB's Scoping Plan. CARB expects the Low

⁸⁰ CARB, *First Update to the Climate Change Scoping Plan*, May 2014.

⁸¹ *Ibid.*, p. 34.

Carbon Fuel Standard to achieve the minimum ten percent reduction goal. However, many of the early action items outlined in the Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493 (see previous discussion), the Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent.

AB 811

AB 811, enacted July 21, 2008, authorizes California cities and counties to designate districts within which willing property owners may enter into contractual assessments to finance the installation of renewable energy generation and energy efficiency improvements that are permanently fixed to the property.

SB 375

SB 375, adopted in September 30, 2008, provides a means for achieving AB 32 goals through the reduction in emissions by cars and light trucks. SB 375 requires Regional Transportation Plans (RTPs) prepared by Metropolitan Planning Organizations (MPOs) to include Sustainable Communities Strategies (SCSs). In adopting SB 375, the Legislature found that improved coordination between land use planning and transportation planning is needed in order to achieve the GHG emissions reduction target of AB 32. Further, the staff analysis for the bill prepared for the Senate Transportation and Housing Committee's August 29, 2008 hearing on SB 375 began with the following statement: "According to the author, this bill will help implement AB 32 by aligning planning for housing, land use, transportation and greenhouse gas emissions for the 17 MPOs in the state." Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. CARB has set the following reduction targets for SCAG: reduce per capita 8 percent of GHG emissions below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.

E.O. S-13-08

On November 14, 2008, E.O. S-13-08 was signed to direct California to develop methods for adapting to climate change impacts through preparation of a statewide plan. In response to this order, the California Natural Resources Agency coordinated with ten state agencies, multiple scientists, a consulting team, and stakeholders to develop the first statewide, multi-sector adaptation strategy in the country. The resulting report, 2009 California Climate Adaptation Strategy, summarizes the best-known science to assess the vulnerability of the state to climate change impacts, and outlines possible solutions that can be implemented within and across state agencies to promote resiliency. This strategy is the first step in an evolving process to reduce California's vulnerability to climate change impacts.

Adaptation refers to efforts that prepare the state to respond to the impacts of climate change – adjustments in natural or human systems to actual or expected climate changes to minimize harm or take advantage of beneficial opportunities. California's ability to manage its climate risks through adaptation depends on a number of critical factors. These include its baseline and projected economic resources, technology, infrastructure, institutional support and effective governance, public awareness, access to the best available scientific information, sustainably-managed natural resources, and equity in access to these resources.

State CEQA Guidelines Section 15064.4

State CEQA Guidelines Section 15064.4 requires that, in performing environmental review under CEQA, an agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, and which model or methodology to use, or rely on a qualitative analysis or performance-based standards. The lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether a project's GHG emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.
- Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

SB 743

SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce VMT, which contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for certain urban infill projects and eliminating the measurement of auto delay, including level of service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "...reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also allows OPR to develop alternative metrics outside of transit priority areas.

CalGreen

CalGreen is the first statewide Green Building Code. It was developed to provide a consistent approach for green building within California and took effect January 2011. CalGreen lays out minimum requirements for newly constructed buildings in California, which will reduce GHG emissions through improved efficiency and process improvements. It requires builders to install plumbing that cuts indoor water use by as much as 20 percent, to divert 50 percent of construction waste from landfills to recycling, and to use low-pollutant paints, carpets, and floors. CalGreen is updated every three years.

SBs 1078/107/X 1-2, Renewables Portfolio Standard and Renewable Energy Resources Act

SB 1078 and 107, California's Renewables Portfolio Standard, obligated investor-owned energy service providers and Community Choice Aggregations to procure an additional 1 percent of retail sales per year from eligible renewable sources until 20 percent was reached (by 2010). The CPUC and California Energy Commission are jointly responsible for implementing the program. SB X 1-2, called the California Renewable Energy Resources Act, obligates all California electricity providers to obtain at least 33 percent of their energy from renewable resources by 2020.

E.O. S-01-07

This E.O. S-01-07 established a Low-Carbon Fuel Standard and directed the Secretary of Cal-EPA to develop and propose protocols for measuring the life-cycle carbon intensity of transportation fuels.

E.O. B-30-15

On April 29, 2015, Governor Brown issued E.O. B-30-15, stating a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The E.O. establishes GHG emissions reduction targets to reduce emissions to 80 percent below 1990 levels by 2050 and sets an interim target of emissions reductions for 2030 as being necessary to guide regulatory policy and investments in California and put California on the most cost-effective path for long-term emissions reductions. The EO orders "all state agencies with jurisdiction over sources of [GHG] emissions [to] ... implement measures, pursuant to statutory authority, to achieve reductions of [GHG] emissions to meet the 2030 and 2050 [GHG] emissions reductions targets." It directs CARB to "update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent." It directs the Natural Resources Agency to update "Safeguarding California" (the state's climate adaptation strategy) every three years, as specified; directs state agencies to "take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives;" and orders the "State's Five-Year Infrastructure Plan [to] take current and future climate change impacts into account in all infrastructure projects." Among its other directives, the EO provides that "State agencies' planning and investment shall be guided by the ... principle that priority should be given to actions that both build climate preparedness and reduce GHG emissions."

SB 32

On September 8, 2016, California signed into law SB 32, which adds Section 38566 to the Health and Safety Code and requires a commitment to reducing statewide GHG emissions by 2020 to 1990 levels and by 2030 to 40 percent less than 1990 levels. SB 32 was passed with companion legislation AB 197, which provides additional direction for developing the Scoping Plan.

In December 2017, CARB adopted a second update to the Scoping Plan to reflect the 2030 targets set by Executive Order B-30-15 and codified by SB 32. This update calls for strategies that cap the state's GHG emissions at 260 MMTCO₂e by 2030, and would represent a 40 percent reduction from 1990 levels. This includes several key elements, including the following:

- Relying on California’s previously-codified statutory commitment to generate at least half of its electricity from renewable resources by 2030;
- Making more stringent CARB’s pioneering Low Carbon Fuel Standard;
- Depending on the California Energy Commission to strengthen dramatically the state’s already-stringent building and appliance efficiency standards;
- Enforcing strong new rules to reduce state methane and other short-lived climate pollutants that are especially pernicious;
- Supporting and preserving California’s natural and working landscapes in order to enhance carbon sequestration;
- Devising transformative changes to California’s public and private transportation sectors, including a ramped-up conversion of private vehicles from carbon-based to alternative fuels, increased public transit opportunities and progressive land use policies that allow Californians to live closer to their workplaces, thus reducing individual and statewide vehicle miles traveled; and
- Continuing the state’s cap-and-trade program.

As shown on Table 6-17, these reductions are to come from a variety of sectors, including energy, transportation, electric power, waste, and the State’s cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including CARB, the CPUC, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG emissions reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Center for Biological Diversity v. California Department of Fish and Wildlife

On November 30, 2015, the California Supreme Court issued an opinion on GHG emissions significance thresholds for CEQA in the case *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife* (commonly referred to as the Newhall decision) (224 Cal.App.4th 1105) reviewed the methodology used to analyze GHG emissions in an EIR prepared for a project that proposed 20,885 dwelling units with 58,000 residents on 12,000 acres of undeveloped land in a rural area of the County of Los Angeles (unincorporated). That EIR used a “business as usual” (BAU) approach to determine whether the project would impede the state’s compliance with statutory emissions reduction mandate established by the Scoping Plan.

Table 6-17
Examples Of Emission Reductions Needed To Meet Climate Change Scoping Plan Objectives In 2030

Sector	1990 Inventory (Million Metric Tons of CO₂e)	Percent Change from 1990 (MMTCO₂e)	Summary of Recommended Actions
Electric Power	108	-8	Reduce state's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	152	-32	Phase 2 heavy-duty truck GHG emissions standards, zero-emission vehicles (ZEV) action plan for trucks, construct High Speed rail system from San Francisco to Los Angeles, coordinated land use planning, Sustainable Freight Strategy
Industrial	98	-15	Reduce use of high-global-warming-potential compounds from refrigeration, air conditioning, aerosols
Waste	7	-29	Eliminate disposal of organic materials at landfills, in-state infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
<i>Source: Cal EPA, California's 2017 Climate Change Scoping Plan, Nov. 2017</i>			

While the Supreme Court held that establishing a significance criterion based on consistency with AB 32's reduction goals was appropriate, the Court found that there was no substantial evidence supporting the conclusion of the EIR at issue in that case that the project would be consistent with AB 32's reduction goals. As noted above, AB 32 requires statewide GHG emissions to return to 1990 levels by 2020. In the AB 32 Scoping Plan, CARB determined that meeting this statewide GHG reduction goal would require a 29 percent reduction in statewide emissions from a business-as-usual approach (i.e., an approach with no conservation or regulatory efforts beyond what was in place when the forecast was made). Based on this, the EIR had concluded the project would not result in a significant climate change impact, because the project was designed to reduce GHG emissions by 31 percent over a BAU approach. The Supreme Court found that there was no substantial evidence that the project-level reduction of 31 percent in comparison to BAU is consistent with AB 32's statewide goal of a 29 percent reduction from BAU. The court reasoned that the Scoping Plan nowhere related its statewide level of reduction efforts to the percentage of reduction that would or should be required from individual projects, and nothing in the administrative record indicated that the required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy. The Court suggested, however, that an appropriate threshold could assess whether a project would comply with regulatory programs designed to reduce emissions from particular activities. The Court recognized that to the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan, and adopted by CARB or other state agencies, a lead agency could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill a statewide plan for the reduction or mitigation of GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a

determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

Regional

SCAG's 2016-2040 RTP/SCS

The California Legislature passed SB 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires MPOs to prepare an SCS in their RTPs to achieve the per capita GHG emissions reduction targets. For the SCAG region, the SCS is contained in the 2016-2040 RTP/SCS. The 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 an improved jobs-housing balance and more opportunity for transit-oriented development. At the regional level, the 2016-2040 RTP/SCS represents the region's Climate Action Plan that defines strategies for reducing GHG emissions.

While Southern California is a leader in reducing emissions, and ambient levels of air pollutants are improving, the SCAG region continues to have the worst air quality in the nation. SCAG is the MPO for the six-county region that includes Los Angeles, Orange, Riverside, Ventura, San Bernardino and Imperial counties. The 2016–2040 RTP/SCS includes commitments to reduce emissions from transportation sources to comply with SB 375. Goals and policies included in the 2016–2040 RTP/SCS to reduce air pollution consist of adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). SCAG promotes the following policies and actions related to active transportation to help the region confront congestion and mobility issues and consequently improve air quality:

- Implement Transportation Demand Management (TDM) strategies including integrating bicycling through folding bikes on buses programs, triple racks on buses, and dedicated racks on light and heavy rail vehicles;
- Encourage and support local jurisdictions to develop "Active Transportation Plans" for their jurisdiction if they do not already have one;
- Expand Compass Blueprint program to support member cities in the development of bicycle plans;
- Expand the Toolbox Tuesday's program to encourage local jurisdictions to direct enforcement agencies to focus on bicycling and walking safety to reduce multimodal conflicts;
- Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public;
- Encourage children, including those with disabilities, to walk and bicycle to school;

- Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network; and
- Support local jurisdictions to connect all of the cities within the SCAG region via bicycle facilities.

SB 375 requires CARB to develop regional CO₂ emission reduction targets, compared to 2005 emissions, for cars and light trucks only for 2020 and 2035 for each MPO. Each MPO is to prepare an SCS as part of the RTP in order to reduce CO₂ by better aligning transportation, land use, and housing. For SCAG, the targets are to reduce per capita emissions 8 percent below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.⁸² The 2016–2040 RTP/SCS states that the region will meet or exceed the SB 375 per capita targets, lowering regional per capita GHG emissions (below 2005 levels) by eight percent by 2020 and 18 percent by 2035. The 2016–2040 RTP/SCS also states that regional 2040 per capita emissions would be reduced by 22 percent, although CARB has not established a 2040 per capita emissions target.

SCAQMD

The SCAQMD adopted a Policy on Global Warming and Stratospheric Ozone Depletion on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the AQMP. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy. SCAQMD released draft guidance regarding interim CEQA GHG emissions significance thresholds. SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO₂e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG emissions significance threshold of 10,000 metric tons of CO₂e for stationary source/industrial projects where the SCAQMD is the lead agency.

However, the SCAQMD has yet to adopt GHG emissions significance thresholds for land use development or transportation projects and has formed a GHG CEQA Significance Threshold Working Group to further evaluate potential GHG emissions significance thresholds. The GHG CEQA Significance Threshold Working Group is tasked with providing guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group included government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing CEQA GHG emissions significance thresholds. The working group discussed multiple methodologies for determining Project significance. These methodologies included categorical exemptions, consistency with regional GHG emissions budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. The GHG CEQA Significance Threshold Working Group has not convened since 2008.

⁸² *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.*

Local*GreenLA Climate Action Plan*

The City has issued guidance promoting sustainable development to reduce GHG emissions citywide in the form of a Climate Action Plan (CAP). The objective of GreenLA is to reduce GHG emissions 35 percent below 1990 levels by 2030.⁸³ GreenLA identifies goals and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations, and create a framework to address citywide GHG emissions. GreenLA lists various focus areas in which to implement GHG emissions reduction strategies. Focus areas include energy, water, transportation, land use, waste, port, airport, and ensuring that changes to the local climate are incorporated into planning and building decisions. City goals for each focus area are identified as follows:

- Energy
 - Increase the generation of renewable energy;
 - Encourage the use of mass transit;
 - Develop sustainable construction guidelines;
 - Increase citywide energy efficiency; and
 - Promote energy conservation.
- Water
 - Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.
- Transportation
 - Power the city vehicle fleet with alternative fuels; and
 - Promote alternative transportation (e.g., mass transit and rideshare).
- Other Goals
 - Create a more livable City through land use regulations;
 - Increase recycling;

⁸³ *City of Los Angeles, GreenLA: An Action Plan to Lead the Nation in Fighting Global Warming, May 2007.*

- Reduce emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more city parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

In order to provide detailed information on action items discussed in GreenLA, the City published an implementation document titled ClimateLA.⁸⁴ ClimateLA presents the existing GHG emissions inventory for the City, describes enforceable GHG emissions reduction requirements, provides mechanisms to monitor and evaluate progress, and includes mechanisms that allow the plan to be revised in order to meet targets. By 2030, the plan aims to reduce GHG emissions by 35 percent from 1990 levels, which were estimated to be approximately 54.1 million metric tons.

Thus, the City will need to lower annual GHG emissions to approximately 35.1 million metric tons per year by 2030. To achieve these reductions the City has developed strategies that focus on energy, water use, transportation, land use, waste, open space and greening, and economic factors. To reduce emissions from energy usage, ClimateLA proposes the following goals: increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP); present a comprehensive set of green building policies to guide and support private sector development; reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizens to use less energy. With regard to waste, ClimateLA sets the goal of reducing or recycling 70 percent of trash by 2015. With regard to open space and greening, ClimateLA includes the following goals: create 35 new parks; revitalize the Los Angeles River to create open space opportunities; plant one million trees throughout the City; identify opportunities to “daylight” streams; identify promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborate with schools to create more parks in neighborhoods.

Sustainable City pLAN

In addition to GreenLA, Mayor Eric Garcetti released Los Angeles’s first-ever Sustainable City pLAN (pLAN) on April 8, 2015.⁸⁵ The pLAN is a roadmap to achieving short-term results, and sets a path to strengthen and transform the City in future decades. Recognizing the risks posed by climate change, Mayor Garcetti set time-bound outcomes on climate action, most notably to reduce GHG emissions by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050, all against a 1990 baseline. Through the completion and verification of the GHG inventory update, the City concluded the following:

- The City accounted for approximately 36.2 million metric tons of CO₂e in 1990;
- The City's most recent inventory shows that emissions fell to 26.7 million metric tons of CO₂e in 2016; and

⁸⁴ *City of Los Angeles, CLIMATELA Municipal Program Implementing the GreenLA Climate Action Plan, 2008.*

⁸⁵ *City of Los Angeles, Los Angeles Climate Action Report: Updated 1990 Baseline and 2013 Emissions Inventory Summary, 2015.*

- L.A.'s emissions are 26 percent below the 1990 baseline as of 2016, putting the City more than halfway to the 2025 pLAN reduction target of 45 percent. In addition, the 20 percent reduction exceeds the 15 percent statewide goal listed in the First Update to the AB 32 Scoping Plan.

Green Building Program

The purpose of the City's Green Building Program is 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 program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses the following five key areas:

- Project Sites: location, site planning, landscaping, storm water management, construction and demolition recycling;
- Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation;
- Energy & Atmosphere: energy efficiency, and clean/renewable energy;
- Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and
- Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control.

The Standard of Sustainability establishes a requirement for non-residential projects at or above 50,000 square feet of floor area, high-rise residential (above six stories) projects at or above 50,000 square feet of floor area, or low-rise residential (six stories or less) of 50 or more dwelling units within buildings of at least 50,000 square feet of floor area to meet the intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Certified level. The Standard also applies to existing buildings that meet the minimum thresholds described above when redevelopment construction costs exceed a valuation of 50 percent of the existing building's replacement cost. The voluntary Standard of Sustainable Excellence establishes an incentive program for projects that register with the LEED program, contract with a certified LEED professional, and can demonstrate how the Project will achieve LEED certification at a Silver or higher level.

Los Angeles Green Building Code

The City has adopted the Green Building Code to reduce the City's carbon footprint. The Green Building Code is applicable to new buildings and alterations with building valuations over \$200,000 (residential and non-residential). The Green Building Code is based on the 2010 California Green Building Standards Code, commonly known as CalGreen that was developed and mandated by the State to attain consistency among the various jurisdictions within the State; reduce the building's energy and water use; and reduce waste (see discussion of CalGreen, above).

Existing Emissions from the Project Sites

To characterize existing conditions on the Project Sites, an emissions model is prepared using the California Emission Estimator Model (CalEEMod version 2016.3.2) to estimate the magnitude of annual GHG emissions associated with the existing uses.

Site 1 is currently developed with a 7,000 square-foot food service building and a surface parking lot. Site 2 is currently developed with a 133-space surface parking lot. Because the parking lots themselves do not generate vehicle traffic or emissions, the sole source of existing anthropogenic GHG emissions is the food service building. As shown on Table 6-18, the bulk of GHG emissions from this facility are generated from mobile sources that travel to and from the facility.

Table 6-18
Existing Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Area Sources	<1	0	0	<1
Energy Sources	23	<1	<1	24
Mobile Sources	499	<1	0	500
Total	523	<1	<1	524

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. Refer to Appendix F.

Impact Analysis

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's OPR on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*.

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁸⁶ The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."⁸⁷ The General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the Project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

⁸⁶ *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed April 7, 2018.*

⁸⁷ *Ibid.*

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

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).⁸⁸

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

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.⁸⁹ For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the OPR has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁹⁰ Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD’s CalEEMod, version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁹¹

Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year

⁸⁸ *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

⁸⁹ *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed April 7, 2018.*

⁹⁰ *OPR Technical Advisory, p. 5.*

⁹¹ *See www.caleemod.com.*

period in accordance with SCAQMD guidance, in order to provide an annual construction emissions estimate comparable to operational emissions. Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. The Project emission reductions are results of the Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard.

Thresholds of Significance

In accordance with Appendix H of the State CEQA Guidelines (CEQA Guidelines), a project would have a significant impact related to GHG emissions if the project would do the following:

- (a): Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment;**
- (b): Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.**

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

Section 15064.4 does not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]).⁹²

Although GHG emissions can be quantified, CARB, the SCAQMD and the City have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.⁹³

⁹² See, generally, Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

⁹³ The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group. More information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed April 7, 2018.

As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.⁹⁴ To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.⁹⁵ Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."⁹⁶ Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with program and/or other regulatory schemes to reduce GHG emissions.⁹⁷

Accordingly, and in conformance with the California Supreme Court's decision in the *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife* case, in the absence of any adopted, quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2016-2040 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 Climate Change Scoping

⁹⁴ 14 CCR § 15064(h)(3).

⁹⁵ *Ibid.*

⁹⁶ *Ibid.*

⁹⁷ See, for example, *San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR-2030 (June 25, 2014)*, in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA..." Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO₂e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, *Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014)*; SCAQMD, *Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014)*; *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)*; and *Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014)*.

Plan, the City of Los Angeles' LA Green Plan, and the Sustainable City pLAn. As discussed above, OPR has noted that lead agencies should make a good-faith effort to calculate or estimate GHG emissions from a project. Project GHG emissions are therefore quantified below, consistent with OPR guidelines.

Project Design Features

The following measures are included as part of the Project and would reduce GHG emissions:

- The Project shall not include natural gas-fueled fireplaces in the proposed residential units.
- Twenty percent of the Project's provided vehicle parking spaces would be capable of accommodating electric vehicle (EV) charging stations, and an additional five percent would be wired as EV charging stations for immediate use.
- The Project would incorporate approximately 10,500 square feet of solar voltaic panes on building roof levels. Approximately 4,500 square feet would be included on Site 1, and approximately 6,000 square feet would be included on Site 2.
- Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems.
- Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.
- Materials selection for the building would be made taking into consideration energy conservation, durability, reduction of air pollutants and recycling. Products would be chosen for their resiliency and durability in order to help offset maintenance costs. Finish materials would have no or low volatile organic (VOC) compounds, in order to help reduce the introduction of harmful chemicals into the building. Materials would be chosen for their pre/post-consumer content to reduce the amount of virgin material being used and reduce amount of waste.
- Plants and their substrate would act as a natural water filter reducing the contamination of water that leaves the site. Low-maintenance native and adapted plants would be chosen for landscaped areas and will take into consideration creating create mini-ecosystems with habitats for birds and beneficial insects in order to increase the biodiversity at the site. The landscaped area could reduce the urban heat island effect and smog as the plants act as a natural air filter and absorb heat versus reflecting it. Pervious paving areas may also be used to reduce the amount of hardscape, decrease storm water run-off, and cool the microclimate of the building.
- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.

- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

Project Impacts

Construction Emissions

Construction of the Project would generate GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Sites. These emissions would vary day to day over the 49-month duration of construction activities. As shown on Table 6-19, construction emissions of CO₂e would peak in 2020, when up to 13,742 pounds of CO₂e per day are anticipated. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing the total of all construction emissions over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 6-19
Estimated Construction Emissions –
Unmitigated (Pounds per Day)

Construction Year	CO₂	CH₄	N₂O	CO₂e
2019 (Site 1)	24,392	2	0	24,433
2020 (Site 1)	21,323	2	0	21,370
2021 (Site 1)	6,017	1	0	6,038
2022 (Site 1)	501	<1	0	502
2022 (Site 2)*	30,126	2	0	30,181
2023 (Site 2)*	6,010	<1	0	6,023
Total (Annualized Emissions MTCO₂e)	2,213	<1	0	2,219
<i>Pounds per Day</i>				
<i>* Site 2 construction would commence after completion of Site 1 work.</i>				
<i>Source: DKA Planning, 2018, based on CalEEMod 2016.3.2. Refer to Appendix F.</i>				

Operational Emissions

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. This includes the Project's prohibition of natural gas-

fueled fireplaces in the development. As shown on Table 6-20, the Project is expected to result in a total of approximately 13 MTCO₂e of GHG emissions per year from area sources.

Table 6-20
Estimated Annual CO₂e Greenhouse Gas Emissions

Source	Annual Emissions
Area Sources	13
Energy Sources	2,746
Mobile Sources	2,616
Waste Sources	200
Water Sources	723
Construction	74
Total Emissions	6,372
<i>metric tons per year</i>	
<i>Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.</i>	
<i>Source: DKA Planning, 2018.</i>	

Energy Source Emissions

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. As shown on Table 6-20, Project GHG emissions from electricity and natural gas usage would result in a total of approximately 2,746 MTCO₂e per year. This accounts for a 42 percent reduction in energy source emissions with implementation of several statewide energy conservation programs, including reducing energy production emissions from the state's renewables portfolio standard (33 percent), natural gas extraction efficiency measures (1.6 percent), and natural gas transmission and distribution efficiency measures (7.4 percent). In addition, the Project includes design features, such as the incorporation of approximately a total of 10,500 square feet of solar voltaic panels on all roof levels that would reduce energy demand from the Project.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Sites based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates provided by Linscott Law & Greenspan in the Project's traffic study. As shown in Table 6-20, the Project GHG emissions from mobile sources would result in a total of 2,616 MTCO₂e per year

As shown on Table 6-21, the Project’s profile as an urban infill, mixed-use development with proximity to substantial public transit would produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The anticipated reductions in vehicle trips and VMT would range from 0-50 percent in reductions from pass-by trips, five percent from internal capture of trips, and up to ten percent reductions from the substantial mode share from public transit and pedestrian modes. These reductions are attributable to the Project characteristics as being an infill project near transit that supports multi-modal transportation options.

Table 6-21
Daily Vehicle Travel Reductions Associated with the Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Commercial	0%	50%	0%
Office	5%	0%	10%

Source: Linscott Law & Greenspan, Traffic Impact Study Weingart Projects, March 2018.

The measures listed previously under “Project Design Features” would further reduce the Project’s mobile source emissions

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA’s AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown on Table 6-20, the Project scenario would result in a total of approximately 200 MTCO₂e of emissions per year from solid waste management, accounting for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor. As shown on Table 6-20, Project GHG emissions from water/wastewater usage would result in a total of 723 MTCO₂e per year. This includes a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation that alone result in a reduction of approximately 180 MTCO₂e of emissions per year. Specifically, without the City’s sustainability initiatives, the Project would emit about 904 MTCO₂e per year from water-related activities.

Amortized Construction Emissions and Total Operational Emissions

As shown on Table 6-20, when taking into consideration implementation of the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the

GHG emissions for the Project at buildout in 2025 would equal 74 MTCO₂e per year (amortized over 30 years) during construction and 6,298 MTCO₂e per year during operation of the Project with a combined total of 6,372 MTCO₂e per year.

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that indirectly reduce climate change-related emissions, including those listed below. These and other reductions from statewide initiatives are reflected in the Project's estimated GHG emissions.

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Transportation. Both construction and operational activities from the Project Sites would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap-and-Trade program.
- Energy Use. Both construction and operational activities from the Project Sites would generate energy-related emissions that are covered by the state's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- Building structures. Operational efficiencies would be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.
- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

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

Less Than Significant Impact.

Consistency with Applicable Plans

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. Below is a discussion of the Project's consistency with relevant plans and policies that govern climate change, including the following:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;

- SCAG’s 2016-2040 RTP/SCS;
- Sustainable City pLAN;
- Los Angeles Green Building ordinance; and
- City of Los Angeles ClimateLA implementation plan.

As discussed in detail below, the Project would be consistent with all applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, and Project impacts would be less than significant.

Consistency with E.O. S-03-05 and E.O. B-30-15

As discussed below, the Project would be consistent with the state’s Executive Orders S-3-05 and B-30-15, which are orders from the State’s Executive Branch for the purpose of reducing GHG emissions, and which were subsequently codified by AB 32 and SB 32. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use planning consistent with these Executive Orders, because the Project is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and would serve an existing homeless population.

Consistency with the AB 32 Scoping Plan

The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions, including expanding energy efficiency programs, increasing electricity production from renewable resources (at least 33 percent of the Statewide electricity mix), and increasing automobile efficiency, implementing the Low-Carbon Fuel Standard, and developing a cap-and-trade program. These measures are designed to be implemented by state agencies. As discussed below, the Project would not interfere with implementation of the AB 32 measures.

Table 6-22 provides an overview of the Project’s consistency with the GHG emission reduction strategies outlined by Scoping Plan measures. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan.

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
<p>SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.</p>	<p>Consistent. All cooking stoves would either be electric or natural gas. The Project shall prohibit natural gas-fueled fireplaces in the proposed residential units.</p>
<p>California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.</p>	<p>Consistent. LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016.¹ As LADWP would provide electricity service to the Project Sites, the Project would use electricity that is produced consistent with this performance-based standard. Electricity GHG emissions estimates assume that LADWP will receive at least 33 percent of their electricity from renewable sources by 2020.</p>
<p>Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.²</p>	<p>Consistent. LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Sites, the Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in 2025 and thus, the estimated GHG emissions from electricity usage provided above conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions estimates would be further reduced by 17 percent by 2030 as the electricity provided to the Project Sites would meet the requirements under SB 350.</p> <p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR, Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air conditioning (HVAC) systems and insulation. The Project would support this action/strategy because it includes compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).</p>
<p>Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.</p>	<p>Consistent. LADWP meets the requirements of SB 1368. As LADWP would provide electricity service to the Project Sites, the Project would use electricity that meets the requirements under SB 1368.</p>
<p>California Code of Regulations (CCR), Title</p>	<p>Consistent. The Appliance Efficiency Regulations apply</p>

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
<p>20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.</p>	<p>to new appliances and lighting that are sold or offered for sale in California. The Project would include new appliances and lighting that comply with this energy efficiency standard.</p>
<p>CCR, Title 24, Building Standards Code: The 2016 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.</p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.</p>	<p>Consistent. Consistent with regulatory requirements, the Project shall comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction built to 2013 Title 24 standards.³ The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in CARB’s <i>Climate Action Scoping Plan</i>. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the <i>Climate Action Scoping Plan</i> to reduce GHG emissions.</p>
<p>Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.</p>	<p>Consistent. EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions estimates account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.</p>
<p>Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.⁴</p>	<p>Consistent. As with the EISA, the Project would meet the requirements under AB 1109, because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.</p>
<p>Cap-and-Trade Program: The program</p>	<p>Consistent. As required by AB 32 and the Climate</p>

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
<p>establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.</p>	<p>Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's electricity usage would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity) and would be consistent with AB 32 and the Climate Change Scoping Plan.</p>
<p>Assembly Bill 1493 (AB 1493) "Pavley Standards": AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).</p>	<p>Consistent. The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of AB 1493 into mobile source emission factors.</p>
<p>Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).^{5,6}</p>	<p>Consistent. GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.</p>
<p>Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.</p>	<p>Not applicable. Although this is not applicable to the Project since it is a statewide program, standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. The</p>

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
	Project would further support this regulation since the Project would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting future EV charging stations, and the Project would provide at least 5 percent of the total code-required parking spaces with EV charging stations for immediate use.
<p>Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.</p>	<p>Consistent. SB 375 requires SCAG to direct the development of the SCS for the region. The Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial retail and restaurant uses within an HQT. Thus, the Project would be consistent with SCAG's 2016–2040 RTP/SCS as it would be located within an HQT.</p>
<p>California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.</p>	<p>Consistent. GHG emissions related to solid waste generation from the Project would benefit from this regulation, as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would decrease the amount of methane released from the decomposing solid waste. Project-related GHG emissions estimates from solid waste generation includes a 50-percent reduction in solid waste generation source emissions per goals of the City. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material.</p>
<p>CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.</p>	<p>Consistent. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code and reflects approximately a 20 percent reduction in water usage as compared to the base demand. Project-related GHG emissions from water related sources accounts for compliance with water efficiency requirements. Water conservation measures include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high efficiency clothes washers and dishwashers, non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on- demand water heaters in</p>

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
	commercial kitchens and restrooms, when appropriate, among others. The Project would have an overall water use reduction of 20 percent and would meet the requirements of the California Green Building Standards.
<p>Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.</p>	<p>Consistent. As discussed above under Title 24, the Project would meet this performance-based standard. Water conservation measures consistent with Green Building Code requirements include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high efficiency clothes washers and dishwashers, non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on-demand water heaters in commercial kitchens and restrooms, when appropriate, among others. The Project thereby includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.</p>
<p>CARB In-Use Off-Road Regulation: CARB’s in-use off- road diesel vehicle regulation (“Off-Road Diesel Fleet Regulation”) requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.</p>	<p>Consistent. The Project would use construction contractors that would comply with this regulation.</p>
<p>CARB In-Use On-Road Regulation: CARB’s in-use on- road heavy-duty vehicle regulation (“Truck and Bus Regulation”) applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.</p>	<p>Consistent. The Project would use construction contractors that would comply with this regulation.</p>
<p>¹ California Energy Commission, <i>Utility Annual Power Content Labels for 2016</i>, www.energy.ca.gov/pcl/labels/.</p> <p>² Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, Ch. 547.</p> <p>³ CEC, <i>Adoption Hearing, 2016 Building Energy Efficiency Standards</i>.</p> <p>⁴ 2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.</p> <p>⁵ CARB, <i>Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources</i>, October 23, 2009.</p> <p>⁶ Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “lifecycle” of a transportation fuel.</p>	
<p>Source: DKA Planning, 2018.</p>	

The 2017 Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the Climate Change Scoping Plan and First Update, as shown on Table 6-22. A summary of these policies and measures are provided in Table 6-22. Although a

number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

As such, based on the analysis above, the Project would be consistent with the GHG reduction-related actions and strategies in the Climate Change Scoping Plan.

Consistency with SCAG's 2016-2040 RTP/SCS

In order to assess the Project's consistency with the 2016-2040 RTP/SCS, this section considers the Project's land use profile for consistency with that in the 2016-2040 RTP/SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if projects are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Sites' location near substantial local transit bus services places it in an HQTAs. The 2016-2040 RTP/SCS projects that these areas, while comprising only three percent of land area in the region, make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the Project Sites would produce substantial reductions in auto-mode share to and from the sites that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the 2016-2040 RTP/SCS.

Table 6-23 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project also would be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS. (Additional consistency discussion is included in the SCEA's consistency analysis of Section 3 [SCEA Criteria and Transit Priority Project Consistency Analysis]). Therefore, the Project would be consistent with the GHG emissions reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	Consistent. The Project would include 685 dwelling units to serve an existing homeless population that would add to the supply of housing in metropolitan Los Angeles County. Also, the Project would not contribute to any displacement of affordable housing, as the Projects Sites are currently developed non-residential uses.
Focus new growth around transit.	Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the 2016-2040 RTP/SCS focus on increasing development near transit facilities. The Project is also located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743, each of which support transit opportunities and promote a walkable environment. ⁹⁸ The Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1 st Street portal, which is currently under construction.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	Consistent. The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region. It would provide needed low-income and transitional housing in Skid Row. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1 st Street portal, which is currently under construction.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	Consistent. The Project generally would be consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas. Project would provide needed low-income and transitional housing in Skid Row. Specifically, the Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less

⁹⁸ SCAG, *High Quality Transit Areas 2012 – SCAG Region*, http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0, accessed on June 14, 2018.

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		than 1.0 mile from Metro's Regional Connector 1 st Street portal, which is currently under construction.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	Not Applicable. While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	Not Applicable. The Project is an infill development and does not include development of any natural or farm lands.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	Consistent. The Project is an infill development that would minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs. The Project would provide needed housing to serve a homeless population. The Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1 st Street portal, which is currently under construction.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	Not Applicable. This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions	SCAG	Consistent. While this action/strategy is not applicable on a

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
vehicles.	Local Jurisdictions	project-specific basis, because the action/strategy involves the development and implementation of jurisdiction-level policies, the Project would include EV charging infrastructure that supports the penetration of zero-emission vehicles.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	Consistent. While this action/strategy is not applicable on a project-specific basis, because the action/strategy involves the development and implementation of jurisdiction-level policies, the Project would include EV charging infrastructure that supports the penetration of zero-emission vehicles.
Implement shared mobility programs.	SCAG Local Jurisdictions	Not Applicable. While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
<i>Source: SCAG, 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth, April 2016.</i>		

Consistency with City of Los Angeles' Sustainable City pLAN

The Sustainable City pLAN includes both short-term and long-term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAN provides information as to what the City will do with buildings and infrastructure under its control. Specific targets related to housing and development and mobility and transit include the decrease of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025.

The Project would generally comply with these aspirations, as the Project is an infill development consisting of residential and commercial uses on Project Sites located near substantial bus and rail transit services. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, water conservation measures, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAN with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents and guests.

To reduce emissions from energy usage, the Project would be consistent with the Sustainable City pLAN and its focus on increasing the amount of renewable energy provided by LADWP; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities at the Project Sites would generate energy-related emissions that would be reduced by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030. A list of specific energy

efficiency and renewable energy measures can be found in Section 2 (Project Description), under the heading “Project Design Features.”

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City’s water and wastewater integrated resources plan that will increase conservation and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the Sustainable City pLAN.”

With regard to waste, the Project would be consistent with the Sustainable City pLAN goal of increasing landfill diversion rate to at least 90 percent by 2025 and 95 percent by 2035. Operational efficiencies would be built into the Project to reduce energy use and waste, as mandated by the City’s Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with the Sustainable City pLAN and its focus on ensuring proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025; revitalizing the Los Angeles River to create open space opportunities; and identifying promising locations for stormwater infiltration to recharge groundwater aquifers. Therefore, the Project would be consistent with the Sustainable City pLAN.

Consistency with Los Angeles Green Building Ordinance

Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short- and long-term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Sites, including installing Energy Star rated appliances and installation of water-conserving fixtures. The Project would comply with these measures.

The Project would comply with the Los Angeles Green Building Ordinance standards that are consistent with the AB 32 Scoping Plan’s recommendation for communities to adopt building codes that go beyond the state’s codes. Under the Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development.

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.⁹⁹ As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

⁹⁹ U.S. Green Building Council. “Interpretation 10396” accessed at <http://www.usgbc.org/leed-interpretations?keys=10396> February 26, 2015.

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include but not be limited to:
 - Electrical conduits and hardware for future installation of EV charging technology.
2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2016 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:
 - Use of low-emitting paints, adhesives, carpets, coating, and other materials.
 - Equipment and fixtures will comply with the following where applicable:
 - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .78 or higher.
 - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 7.7 or higher.
 - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 10.0 and an Energy Efficiency Ratio of at least 11.6, depending on size category.
 - Installed tank type water heaters will have an Energy Factor higher than .6.
 - Installed tankless water heaters will have an Energy Factor higher than .80.
 - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
 - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
 - An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for connection to a solar energy system with panels to be placed on the rooftops of the proposed buildings. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of an electrical solar energy system.
 - A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.
3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:
- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:
 - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
 - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.
 - When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.
 - When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:
 - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
 - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).
4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. Solid waste from the Project's operations would contribute toward the City's AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of

mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.
- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Consistency with ClimateLA

Construction of the Project would be consistent with ClimateLA's goal to reduce and recycle trash (including construction waste). The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operation of the Project also would be consistent with ClimateLA's focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project would be consistent ClimateLA's focus on reducing emissions from private vehicle use. Specifically, the Project Sites' infill locations with immediate access to significant public transit and pedestrian and bicycle facilities would result in a transit-oriented development that would reduce auto dependence. Further, the mixed-use nature of the Project would be consistent with ClimateLA's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the Project would be consistent with ClimateLA's focus on increasing the amount of renewable energy provided by the LADWP; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project Sites would generate energy-related emissions that are reduced by the state's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that would increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City's Green Building Code that call for water-conserving fixtures and processes. As part of the Water Supply Assessment (WSA) prepared for the Project (refer to Response to Checklist Question

18[b] [Water Supply]), several water conservation features have been incorporated into the Project. These elements of the Project would be consistent with goals set forth in ClimateLA.

The Project Applicant has committed to implement the following water conservation measures that are in addition to those required by the City's Green Building Code for the entire Project:

- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.
- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

With regard to waste, the Project would be consistent with the ClimateLA Plan's goal of reducing and of trash. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with ClimateLA's focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

For these reasons, the Project would be consistent with ClimateLA.

Conclusion Regarding Project Consistency

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the Climate Change Scoping Plan, the 2016-2040 RTP/SCS, and the ClimateLA plan. In addition, consistency with the above plans, policies, regulations and GHG reduction actions/strategies would serve to reduce GHG emissions for the Project. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the

environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Cumulative Impacts

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

The Project would be consistent with the approach outlined in CARB's Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan, the Project would be designed to achieve the standards of CALGreen.

Currently, there are no applicable CARB, SCAQMD, or City significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emission, including E.O. S-3-05, E.O. B-30-15, the Scoping Plan, SCAG's 2016-2040 RTP/SCS, and ClimateLA.

As discussed above, the Project is consistent with these applicable GHG reduction plans and policies. As such, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

8. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use

development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the routine transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities. The existing 7,000-square-foot food service building on Site 1 was built in 1922, prior to the current asbestos and lead regulations, and thus could contain asbestos-containing materials (ACMs) and lead-based paint (LBP). (No buildings are located on Site 2.)

Pursuant to SCAQMD Rule 1403, prior to the issuance of any demolition and/or alteration permits, the Project Applicant shall provide a letter to the LADBS from a qualified asbestos abatement consultant indicating that no ACMs are present on Site 1. If ACMs are discovered on site, during demolition or construction proper abatement regulations shall be followed. Because the Project 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/or renovation activities, as well as other applicable state and federal regulations, impacts from ACMs would be less than significant. Additionally, demolition and removal of the existing buildings would be required to comply with CCR Title 8, Section 1532 et seq., which requires that all LBP be abated and removed by a licensed lead contractor. Standard handling and disposal practice shall be implemented pursuant to California Department of Industrial Relations (Cal-OSHA) regulations. Prior to issuance of a demolition permit, a LBP survey shall be performed and approved by the LADBS. Thus, construction of the Project would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

The Project includes the development of 685 residential dwelling units and approximately 48,043 square feet of commercial (i.e., philanthropic, retail, and office) land uses. The types of hazardous materials that would be found on the Project Sites during the Project's operational phase would be typically associated with residential and commercial land uses – paints, cleaning supplies, small amounts of petroleum products. The Project would not require routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal, compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant. Therefore, impacts related to this issue would be less than significant.

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

Less Than Significant With Mitigation Incorporated. The information and analysis below is based primarily on the following documents, which are included in Appendix I:

- *Phase I Environmental Site Assessment, 552 S. San Pedro Street and 557 Crocker Street Los Angeles, CA 90013, Advantage Environmental Consultants, LLC, March 14, 2018.*

- *Phase I Environmental Site Assessment, 600-628 S. San Pedro Street and 611-615 Crocker Street Los Angeles, CA 90021, Advantage Environmental Consultants, LLC, April 2, 2018.*
- *Phase II Environmental Site Assessment, 600-628 S. San Pedro Street and 611-615 Crocker Street Los Angeles, CA 90021, Advantage Environmental Consultants, LLC, March 28, 2018.*

Advantage Environmental Consultants, LLC (AEC) prepared the Phase I Environmental Site Assessments (Phase I ESAs) for the Project Sites in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13, 40 Code of Federal Regulations (F) Part 312.

The following tasks were conducted as part of the Phase I ESAs:

- A search for environmental liens and other potential environmental related encumbrances to title of the Project Sites.
- An evaluation of standard environmental record sources contained within federal, state, and local environmental databases within specific search distances.
- An evaluation of additional environmental record sources obtained from regulatory departments/agencies.
- A qualitative evaluation of the physical characteristics of the Project Sites through a review of published topographic, geologic, and hydrogeologic maps; published groundwater data; and area observations to characterize surface water flow in vicinity of the Project Sites.
- An evaluation of past use of the Project Sites and adjacent/nearby property uses through a review of historical resources including topographic maps, aerial photographs, and City directories.
- A physical inspection of the Project Sites to search for conditions indicative of potential environmental concerns including underground storage tanks (USTs), aboveground storage tanks (ASTs), associated tank piping; stained soil or pavement; equipment that may contain or have historically contained polychlorinated biphenyls (PCBs); and other potential environmental concerns as defined in the ASTM E 1527-13 standard.
- A physical assessment of indications of past uses and visual observations of adjacent and surrounding properties (from curbside or public spaces) to assess potential impacts to the Project Sites.
- Interviews completed with the Project Applicant, owners of the Project Sites, and a local regulatory agency representative.
- Preparation of the Phase I ESAs, which includes the findings of the assessment and AEC's professional opinion regarding the level of significance of the findings. Conclusions were drawn based on the significance levels of the findings with subsequent recommendations provided.

In addition, concurrent with preparation of the Phase I ESA prepared for Site 2, AEC also prepared a Phase II ESA for Site 2. The results of these studies for each of the sites are discussed below.

Site 1

Standard Environmental Record Sources

The federal databases shown on Table 6-24 related to potential on-site and off-site sources of contamination were reviewed and interpreted by AEC.

**Table 6-24
Federal Database Search (Sites 1 and 2)**

Federal Databases	Search Distance From Sites
National Priorities List (NPL)	One mile
Delisted NPL	One mile
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)	One-half mile
CERCLIS No Further Remedial Action Planned (NFRAP)	One-half mile
Resource Conservation and Recovery Act (RCRA) CORRACTS Hazardous Waste Treatment, Storage and Disposal (TSD) Facilities	One mile
RCRA non-CORRACTS Hazardous Waste TSD Facilities	One-half mile
RCRA Hazardous Waste Generators (RCRA GEN)	One-eighth mile
Emergency Response Notification System (ERNS)	One-eighth mile
Federal Institutional/Engineering Control Registries (IC/EC)	One-half mile

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

The state and local databases related to potential on-site and off-site sources of contamination were also searched and reviewed by AEC (refer to Table 6-25).

**Table 6-25
State and Local Database Search (Sites 1 and 2)**

State/Local Databases	Search Distance From Sites
State-equivalent NPL and CERCLIS (RESPONSE and ENVIROSTOR)	One mile
State Voluntary Cleanup Sites (VCP)	One-half mile
State Landfill and/or Solid Waste Disposal Sites (SWF/LF)	One-half mile
State Leaking Storage Tank (LUST, SLIC, SAM)	One-half mile
State Registered Storage Tank (UST, AST)	One-eighth mile

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

Subject Sites

Site 1 was listed on the underground storage tank (UST) databases (CA SWEEPS UST and CA FID UST) as Weingart Center Associates Inc., at 554 S San Pedro Street. A single UST is referenced for the site on

the database. No further details are provided, and Site 1 does not appear on other databases that indicate unauthorized releases of hazardous substances or petroleum products to the subsurface.

Site 2 was listed on UST databases (CA SWEEPS UST and CA FID UST) as Community Redevelopment Agency at 600 S San Pedro Street. No further details are provided, and Site 2 does not appear on other databases that indicate unauthorized releases of hazardous substances or petroleum products to the subsurface have occurred.

Adjoining and Nearby Properties

Several listings were mapped in the standard regulatory databases within 1/4-mile of Sites 1 and 2. Table 6-26 presents a summary of the listed facilities and an opinion regarding their potential impact to Site 1. Table 6-27 presents a summary of the listed facilities and an opinion regarding their potential impact to Site 2.

The properties listed on the tables are not considered to be significant environmental concerns to the Project Sites. In addition, several properties mapped between one-quarter to one-mile from the sites also appear on various regulatory databases. These properties are also not considered to be significant environmental concerns to the Project Sites. These conclusions are based on several factors, including the nature of the regulatory database listings, distance of the off-site listed properties from the Project Sites, orientation of the listed properties relative to the sites, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the database.

Non-ASTM Database Reviews

Below is a list of non-ASTM databases reviewed by AEC during the preparation of the Phase I ESAs. The descriptions of each database and their data release frequency are included in the Phase I ESAs in Appendix I to this SCEA.

Local Brownfield Lists

US BROWNFIELDS - A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

DEBRIS REGION 9 - Torres Martinez Reservation Illegal Dump Site Locations

ODI - Open Dump Inventory

WMUDS/SWAT - Waste Management Unit Database

SWRCY - Recycler Database

HAULERS - Registered Waste Tire Haulers Listing

Table 6-26
Adjoining and Nearby Properties – Site 1

Listed Property and Address	Database(s)	Mapped Distance and Direction From Site	Details	Significant Concern To Site?
Weingart Center 515 E 6 th Street	UST	0.006-mile S	Referenced on the UST database with no indications of violations or a release.	No
Union Rescue Mission 547 S San Pedro Street	UST	0.023-mile NNW	Referenced on the UST database with no indications of violations or a release.	No
Mission Energy Offset Plate Co 421 E 6 th Street	RCRA-GEN	0.030-mile SW	Referenced as a small quantity generator with no reported violations.	No
C and J Circe Screen, UNK 532 S Crocker Street	RCRA-GEN	0.039-mile E	Referenced as a small quantity generator with no reported violations. Referenced on the UST database with no indications of violations or a release.	No
LA Electronics Bldg 526 S San Pedro Street	RCRA GEN	0.047-mile NNE	Referenced as a small quantity generator with no reported violations.	No
UNK 526 S Crocker Street	UST	0.052-mile E	Referenced on the UST database with no indications of violations or a release.	No
Community Redevelopment Agency 600 S San Pedro Street	UST	0.060-mile SW	Referenced on the UST database with no indications of violations or a release.	No
Skid Row Housing Trust 521 S San Pedro Street	RCRA-GEN	0.062-mile N	Referenced as a small quantity generator with no reported violations.	No
City Sea Foods Inc. 531 Towne Avenue	UST	0.068-mile E	Referenced on the UST database with no indications of violations or a release.	No
Precision Metal Tech 534 Towne Avenue	RCRA-GEN	0.081-mile ESE	Referenced as a small quantity generator with no reported violations.	No
GTE 505 S San Pedro Street	UST	0.088-mile N	Referenced on the UST database with no indications of violations or a release.	No
Marks Engineering 501 E 5 th Street	UST	0.122-mile NNE	Referenced on the UST database with no indications of violations or a release.	No
Central Facility Garage 519 Wall Street	LUST	0.154-mile NNW	Referenced with a “Completed Case Closed” regulatory case status as of 7/2015.	No
Former Ace Plating 719 Towne Avenue	Envirostor SLIC	0.240-mile SSW	Referenced with an “Inactive-Needs Evaluation” case status on the Envirostor database. Referenced with an open case status as of 6/2013 on the SLIC database due to contamination from plating operations.	No

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

**Table 6-27
Adjoining and Nearby Properties – Site 2**

Listed Property and Address	Database(s)	Mapped Distance and Direction From Site	Details	Significant Concern To Site?
Weingart Center 515 E 6 th Street	UST	0.029-mile NE	Referenced on the UST database with no indications of violations or a release.	No
Mission Energy Offset Plate Co 421 E 6 th Street	RCRA-GEN	0.037-mile NNW	Referenced as a small quantity generator with no reported violations.	No
Latt Greene, Sheary Fran Knitin 611 E 7 th Street	UST	0.065-mile SW	Referenced on the UST database with no indications of violations or a release.	No
Union Rescue Mission 547 S San Pedro Street	UST	0.069-mile N	Referenced on the UST database with no indications of violations or a release.	No
The Salvation Army 660 Towne Avenue	UST	0.090-mile SW	Referenced on the UST database with no indications of violations or a release.	No
C and J Circe Screen 532 S Crocker Street	RCRA-GEN	0.038-mile E	Referenced as a small quantity generator with no reported violations.	No
LA Electronics Bldg, UNK 526 S Crocker Street	RCRA-GEN UST	0.100-mile NNE	Referenced on the UST database with no indications of violations or a release. Referenced as a small quantity generator with no reported violations.	No
Skid Row Housing Trust 521 S San Pedro Street	RCRA-GEN	0.113-mile NNE	Referenced as a small quantity generator with no reported violations.	No
Image Laboratories, Inc. 721 S San Pedro Street	UST	0.117-mile SW	Referenced on the UST database with no indications of violations or a release.	No
City Foods Inc. 531 Towne Avenue	UST	0.119-mile ENE	Referenced on the UST database with no indications of violations or a release.	No

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

Local Lists of Hazardous Waste / Contaminated Sites

US CDL - Clandestine Drug Labs
 HIST Cal-Sites - Historical Calsites Database
 SCH - School Property Evaluation Program
 Toxic Pits - Toxic Pits Cleanup Act Sites
 CDL - Clandestine Drug Labs
 US HIST CDL - National Clandestine Laboratory Register

Local Lists of Registered Storage Tanks

SWEEPS UST – SWEEPS UST Listing
 HIST UST – Hazardous Substance Storage Container Database
 CA FID UST – Facility Inventory Database

Local Land Records

LIENS 2 - CERCLA Lien Information
LIENS - Environmental Liens Listing
DEED - Deed Restriction Listing

Records of Emergency Release Reports

HMIRS - Hazardous Materials Information Reporting System
CHMIRS - California Hazardous Material Incident Report System
LDS - Land Disposal Sites Listing
MCS - Military Cleanup Sites Listing
SPILLS 90 – SPILLS 90 data from FirstSearch

Other Ascertainable Records

RCRA-NonGen - RCRA - Non Generators
DOT OPS - Incident and Accident Data
DOD - Department of Defense Sites
FUDS - Formerly Used Defense Sites
CONSENT - Superfund (CERCLA) Consent Decrees
ROD - Records Of Decision
UMTRA - Uranium Mill Tailings Sites
MINES - Mines Master Index File
TRIS - Toxic Chemical Release Inventory System
TSCA - Toxic Substances Control Act
FTTS – FIFRA/TSCA Tracking System – FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS - FIFRA/TSCA Tracking System Administrative Case Listing
SSTS - Section 7 Tracking Systems
ICIS - Integrated Compliance Information System
PADS - PCB Activity Database System
MLTS - Material Licensing Tracking System
RADINFO - Radiation Information Database
FINDS - Facility Index System/Facility Registry System
RAATS - RCRA Administrative Action Tracking System
RMP - Risk Management Plans
CA BOND EXP. PLAN - Bond Expenditure Plan
UIC - UIC Listing
NPDES - NPDES Permits Listing
Cortese - "Cortese" Hazardous Waste & Substances Sites List
HIST CORTESE - Hazardous Waste & Substance Site List
CUPA Listings - CUPA Resources List
Notify 65 - Proposition 65 Records

DRYCLEANERS - Cleaner Facilities
 WIP - Well Investigation Program Case List
 ENF - Enforcement Action List
 HAZNET - Facility and Manifest Data
 EMI - Emissions Inventory Data
 INDIAN RESERV - Indian Reservations
 SCRDRYCLEANERS - State Coalition for Remediation of Drycleaners Listing
 MWMP - Medical Waste Management Program Listing
 COAL ASDH DOE – Sleam Electric Plan Operation Data Listing
 COAL ASH EPA – Coal Combustion Residues Surface Impoundments List
 HWT - Registered Hazardous Waste Transporter Database
 HWP - Envirostor Permitted Facilities List
 FINANCIAL ASSURANCE - Financial Assurance Information Listing
 LEAD SMELTERS - Lead Smelter Sites
 2020 COR ACTION - 2020 Corrective Action Program List
 US AIRS - Aerometric Information Retrieval System Facility Subsystem
 PRP - Potentially Responsible Parties
 WDS - Waste Discharge System
 EPA WATCH LIST - EPA WATCH LIST
 US FIN ASSUR - Financial Assurance Information
 PCB TRANSFORMER - PCB Transformer Registration Database
 PROC - Certified Processors Database
 FUSRAP - Formerly Utilized Sites Remedial Action Program
 US MINES – Mines Master Index File
 PEST LIC – Pesticide Regulation Licenses Listing
 WASTEWATER PITS – Oil Wastewater Pits Listing
 ECHO – Enforcement and Compliance History Information
 FUELS PROGRAM – EPA Fuels Program Registered Listing
 Los Angeles Co. HMS – County of Los Angeles
 LA Co. Site Mitigation – County of Los Angeles

Non-ASTM Database Listings

There are no non-ASTM database listings mapped on the Project Sites. There are multiple off-site properties (two US Brownfields, one CA HIST Cal-Sites, two Los Angeles Co. HMS, one NY Manifest, and one LA Co. Site Mitigation) listed on the non-ASTM databases in the searched vicinity of Site 1. These properties are not considered to be significant environmental concerns to Site 1. There are multiple off-Site properties (three US Brownfields, two CA HIST Cal-Sites, one CHMIRS, two Los Angeles Co. HMS, one NY Manifest, and one LA Co. Site Mitigation) listed on the non-ASTM databases in the searched vicinity of Site 2. These properties are not considered to be significant environmental concerns to Site 2. These conclusions are based on several factors, including distance of the off-site listed properties from the sites, orientation of the listed properties relative to the sites, interpreted direction of groundwater flow, and/or regulatory case status information (i.e. “closed case”) for the various properties as described in the database report.

Additional Environmental Record Sources

LAFD – UST Request

Site 1: AEC conducted a records search with the LAFD for Site 1, No files were identified for the site, except for a single record identified for 554 South San Pedro Street. A “Fire Permit Application for Underground Storage Tanks or Atmospheric Systems” was provided to AEC by the LAFD. The permit was for the installation of a single UST, was signed and dated by a representative of the Weingart Center Association on October 24, 1988 and was dated by the Los Angeles City Clerk on November 8, 1988. No additional information regarding USTs at Site 1 was found in LAFD files, including documentation that the UST in question was actually installed. During the preparation of this assessment, Weingart Center representatives were interviewed regarding the potential presence of a tank at the property, and no such representatives were aware of a tank being present.

Site 2: AEC conducted a records search with the LAFD for Site 2. Several files were identified for the site regarding installation and removal of eleven USTs 1935 and 1990. All USTs appear to have been removed from Site 2 by 1990. Reports were provided in the records search documenting the discovery of petroleum hydrocarbon impacted soil at the bottom of a former tank pit during the removal of a 1,000-gallon tank in June 1990. The pit was lined with plastic and backfilled with the excavated material. Subsurface work in 1991 included drilling in the area around the excavation to delineate the contaminated area. The material in the pit was subsequently excavated and removed from the site as non-hazardous waste. A no further action letter from the City was issued on January 27, 1992.

Los Angeles Department of Building and Safety

Site 1: AEC searched for building records pertaining to Site 1 on the LADBS website. Records included various construction, alteration, demolition, and general structural related permits for the Site. There were no references in the permits to USTs, hazardous wastes/materials or other potential environmental concerns.

Site 2: AEC searched for building records pertaining to Site 2 on the LADBS website. Records included an “Application for the Erection of a Building” dated December 11, 1935 for a gasoline filling station for General Petroleum Corp. A grading permit application for the removal of contaminated soil for tank removal dated October 28, 1991. A figure accompanying the permit application shows the excavation location near the central area of the site. Other permits noted during the records search included various construction, alteration, demolition, and general structural related permits for Site 2.

State Water Resources Control Board

AEC searched the California State Water Resources Control Board (SWRCB) maintained Geotracker database for information regarding past or present environmental regulatory cases and/or hazardous material releases in connection with the Project Sites or its adjacent and nearby properties. No environmental regulatory or release cases for the Project Sites were identified in the Geotracker database search. Off-site properties identified on the Geotracker database search are not considered to be a concern to the Project Sites.

Historical Use Information

Historical sources were reviewed to develop a history of the previous uses of the Project Sites and adjacent/nearby properties to help identify the likelihood of past uses having led to RECs in connection with the sites.

Fire Insurance Maps

Sanborn fire insurance maps were reviewed for the years of 1888, 1894, 1906, 1920, 1950, 1953, 1954, 1959, 1960, 1967, and 1970 with respect to the Project Sites. The results of the map review for Site 1 are summarized on Table 6-28. The results of the map review for Site 2 are summarized on Table 6-29.

**Table 6-28
Sanborn Maps Review Results – Site 1**

Year	Observations
1888	SITE: The site is vacant. SURROUNDING AREA: Residential dwellings are partially depicted on the northwestern adjacent property beyond S San Pedro Street. Other adjacent properties are vacant. Surrounding streets and roadways are depicted similar to their current configurations.
1894	SITE: The site is vacant. SURROUNDING AREA: A dwelling is depicted on the northern and southwestern adjacent properties. Other dwellings are scattered in the surrounding area.
1906, 1920	SITE: Lodgings and ancillary structures and a dwelling are depicted in the eastern portion of the site addressed as 555 and 557 Crocker Street. The remainder of the site is vacant. SURROUNDING AREA: The surrounding area consists of residential and commercial buildings.
1950, 1953, 1954	SITE: The eastern portion of the site is similar to the 1920 map. A commercial building is depicted on the western portion of the site with multiple storefronts. SURROUNDING AREA: A mixed-use structure with a hotel depicted on the southwestern adjacent property is similar to its current configuration. The western adjacent property beyond S San Pedro Street is depicted as a mixed-use structure. A two-story structure is depicted on the southeastern adjacent property (northwestern corner of E 6 th Street and Crocker Street) with “Gas & oil” labeled on the corner of the property in 1950. The corner is labeled as parking in 1953 and 1954.
1959, 1960	SITE: The eastern portion of the site consists of a single building labeled as “lodging.” A commercial building is depicted on the western portion of the site with multiple storefronts. SURROUNDING AREA: The surrounding area consists of residential and commercial buildings and parking lots.
1967, 1970	SITE: The eastern portion of the site is vacant. A commercial building is depicted on the western portion of the site with multiple storefronts. SURROUNDING AREA: The surrounding area consists of residential and commercial buildings and parking lots.
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>	

**Table 6-29
Sanborn Maps Review Results – Site 2**

Year	Observations
1888	<p>SITE: A stable and a shed are depicted on the site.</p> <p>SURROUNDING AREA: Three residential dwellings are depicted on the northwestern adjacent property beyond S San Pedro Street. Other adjacent properties are vacant. Surrounding streets and roadways are depicted similar to their current configurations.</p>
1894	<p>SITE: A single dwelling is depicted on the eastern side of the site along Crocker Street.</p> <p>SURROUNDING AREA: A dwelling is depicted on the northern and southeastern adjacent properties.</p>
1906, 1920	<p>SITE: A commercial structure identified as “Meek’s Bakery” is depicted in the northern portion of the site. The structure is labeled with lodgings, a bakery, storage, offices, stores, and a wagon house. Residential flats and an apartment building are depicted to the south of Meek’s Bakery along S San Pedro Street. Two dwellings are depicted on the eastern side of the site along Crocker Street.</p> <p>SURROUNDING AREA: The surrounding area consists of residential dwellings and flats. A glassworks facility and residential properties are depicted to the northwest of the site across S San Pedro Street. Lodgings and residential properties are depicted to the north of the site across E 6th Street.</p>
1950, 1953, 1954, 1959, 1960, 1967, and 1970	<p>SITE: A rectangular gasoline service station is depicted in the northern area of the site. A glass cutting shop and a store are depicted to the south of the service station along S San Pedro Street. The remaining portions of the site are vacant or labeled as auto parking.</p> <p>SURROUNDING AREA: A service station is depicted on the corner of the intersection to the northwest across S San Pedro Street. Also across S San Pedro Street is a vacant lot labeled as “Earth Fill” and a printing facility. A mixed-use structure with a hotel is depicted on the northern adjacent property across E 6th Street is similar to its current configuration. A vacant lot then a mixed-use structure with a hotel is depicted on the southeastern adjacent property. An apartment building and residential properties are depicted on the southern adjacent properties.</p>

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

City Directories

AEC reviewed City directories for the Project Sites and adjacent properties dating back to 1920. The results of the City directory search are provided for Site 1 and Site 2 on Table 6-30 and 6-31, respectively.

Table 6-30
City Directory Listings Review Results – Site 1

Year	Businesses/Owners/Land Uses
562 S San Pedro Street	
1962	1962 Lewis J W Co
1958	Carroll Machry
1942	Zane Saml Belle
1937	Kissling Frank J
1929	Millet J C Co Wm Wahl
1924	Lake View Creamery Co W F Sperry
560 S San Pedro Street	
19811	El Rey Mkt
1962	Tilery & Cutter Addressing Mach Co
1962-1958	Lewis J W Co RL
1942	Strickland & Davis Co J M Strickland J S Davis
1933	Cutler Hammer Inc W F Price
1924	Stewart Electric Co
558 S San Pedro Street	
1937	O'Neil Leland P Emmeline
1929	Ball Judson A Elsie
1924	Millwork Quantity Survey Bureau JLL
556 S San Pedro Street	
1967	Midway Tool & Supply Co
1958	Diesel Mach Shop Serv
1937	Samrt Clinton H CS
1933	Grinnell Bert Janet cook, Brookman Jos A Sarah
1929	Harmon Edw D
1924	Lincoln Don
554 S San Pedro Street	
1990	Morrison Management Service
1967	Schmitz Paper Punching
1962	Dots Ofc Supply
1958-1937	Chicago Belting Co
1933	Fisher Ray
1929	Murray Jacobs Co H G Kimes Dist Mgr
1924	McGuire Elmer E
552 S San Pedro Street	
1929	Guarra Ameba
557 Crocker Street	
	No listings
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>	

**Table 6-31
City Directory Listings Review Results – Site 2**

Year	Businesses/Owners/Land Uses
600 S San Pedro Street	
1958-1976	Gould Car Service
1951	S San Pedro General Petroleum Corp 6 th & San Pedro Stn, S San Pedro Gould Carl Serv, S San Pedro Olympia Serv Stn
1937	General Petroleum Corp gas stations
610 S San Pedro Street	
1924	Residential (personal names)
612 S San Pedro Street	
1924-1942	Los Angeles Cut Glass Co Bert and Mark Williams
616 S San Pedro Street	
1937	Residential
620 S San Pedro Street	
1924-1933	Residential
622 S San Pedro Street	
1924-1933	Residential
624 S San Pedro Street	
1933	Residential
626 S San Pedro Street	
1951	S San Pedro Associated Distrs
1924-1942	Residential
613 Crocker Street	
1924-1937	Residential
611 Crocker Street	
1924-1937	Residential
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>	

With the exception of the service station listed at 600 S San Pedro Street, listings for the Project Sites are associated with residential and general commercial/retail purposes and are not considered to be significant environmental concerns to the sites. Listings for adjacent properties are associated with residential or general commercial uses and are also not considered to be significant environmental concerns to the site.

Aerial Photographs

AEC reviewed aerial photographs dated 1948, 1952, 1964, 1972, 1980, 1994, 2003, 2005, 2004, 2005, 2009, 2010, and 2012 provided by online resources. The results of the aerial photograph reviews for Site 1 are summarized on Table 6-32. The results of the aerial photograph reviews for Site 2 are summarized on Table 6-33.

Table 6-32
Aerial Photograph Review Results – Site 1

Year	Observations
1948, 1952	<p>SITE: The site appears to be developed with two residential structures on the southern half of the site and a commercial structure on the northern half of the site similar to the current configuration.</p> <p>SURROUNDING AREA: A commercial structure is depicted on the southwestern adjacent property similar to current its configuration. A smaller structure appears adjacent to the south of the large structure. Commercial structures are similar to their current configurations to the west beyond S San Pedro Street, and to the north of the site. Dwellings are depicted adjacent to the south across Crocker Street. Nearby streets and roadways appear similar to their current configurations.</p>
1964- 2012	<p>SITE: The southern half of the site appears as a parking lot. The site appears similar to its current configuration.</p> <p>SURROUNDING AREA: Adjacent properties appear similar to their current configurations as residential and commercial buildings and parking lots.</p>
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>	

Table 6-33
Aerial Photograph Review Results – Site 2

Year	Observations
1948-1972	<p>SITE: The site appears to be developed with a rectangular structure in the northern portion the site (gasoline service station). Two structures are depicted along S San Pedro south of the service station area. The structures appearing on-site are similar to what is described in the Sanborn Map review from similar time frames.</p> <p>SURROUNDING AREA: A commercial structure is depicted on the northern adjacent property similar to current its configuration. A service station appears on the northwestern adjacent property beyond S San Pedro Street. A parking lot then a commercial structure appears to the south of the service station. Two residential structures appear to the south of the site along Crocker Street. A structure appears on the southeast adjacent property is similar to its current configuration as a hotel. Nearby streets and roadways appear similar to their current configurations.</p>
1980	<p>SITE: The site appears similar to prior photographs.</p> <p>SURROUNDING AREA: The northwestern adjacent property (former service station) appears to be developed with a large commercial structure.</p>
1994	<p>SITE: The site appears in its current configuration as a parking lot.</p> <p>SURROUNDING AREA: The surrounding area appears in their current configurations.</p>
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>	

State of California Division of Oil and Gas Records

According to online resources provided by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, there are no oil, gas or geothermal wells located on the Project Sites or adjacent properties.

Site Reconnaissance

A reconnaissance of the Project Sites was conducted on March 8, 2018 by Mr. Dan Weis of AEC's Western Regional office. Mr. Weis was accompanied by Weingart Center Association personnel during the site reconnaissance. The objective of the reconnaissance was to obtain information indicating the likelihood of RECs in connection with the Project Sites.

Methodology and Limiting Conditions

The reconnaissance consisted of walking the Project Sites and along public sidewalks (for viewing of adjacent/nearby properties). Full access to the Site was provided. However, it should be noted that the entire surface area of the parking lots at both Sites 1 and 2 was not visible due to the presence of parked vehicles throughout.

General Site Setting

Site 1: The site is currently used as a café and parking lot by the Weingart Center Association. The site and its adjacent/nearby properties are situated within an area of Downtown Los Angeles comprised of residential and commercial properties. The current use of the site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal or generation of significant quantities of hazardous substances or petroleum products that have adversely impacted the subsurface of the site.

Site 2: The site is developed with a paved asphalt parking lot surrounded by chain link fencing. A security guard booth is located at the main access gate on E 6th Street. The site and its adjacent/nearby properties are situated within an area of Downtown Los Angeles comprised of residential and commercial properties. The current use of the site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal or generation of significant quantities of hazardous substances or petroleum products that have adversely impacted the subsurface of the site.

Site Observations

AEC examined Sites 1 and 2 for evidence of the potential RECs shown on Table 6-34 and Table 6-35, respectively. The items noted on the tables are discussed below.

Table 6-34
Site Observation Results – Site 1

Conditions	Not Observed or Noted	Observed or Noted	Significant Environmental Concern?
Hazardous Substances/Petroleum Products	--	X	No
Waste Generation/Storage/Disposal	--	X	No
ASTs	--	X	No
USTs	X	--	--
PCB Containing Equipment	--	X	No
Chemical/Petroleum Odors	X	--	--
Pools of Liquid	X	--	--
Floor Drains/Sumps/Wells	--	X	No
Drums	X	--	--
Stains or Corrosion	X	--	--
Unidentified Substance Containers	X	--	
Stained Soil or Pavement	X	--	--
Stressed Vegetation	X	--	--
Pits, Ponds or Lagoons	X	--	--
Wastewater Discharges/Disposal Systems	X	--	--
Septic Systems/Cesspools	X	--	--
Non-Hazardous Solid Waste Disposal Areas	--	X	No
Drinking Water Systems/Water Wells	X	--	--
Other Wells	X	--	--
<i>Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.</i>			

Table 6-35
Site Observation Results – Site 2

Conditions	Not Observed or Noted	Observed or Noted	Significant Environmental Concern?
Hazardous Substances/Petroleum Products	X	--	--
Waste Generation/Storage/Disposal	X	--	--
ASTs	X	--	--
USTs	X	--	--
PCB Containing Equipment	X	--	--
Chemical/Petroleum Odors	X	--	--
Pools of Liquid	X	--	--
Floor Drains/Sumps/Wells	X	--	--
Drums	X	--	--
Stains or Corrosion	X	--	--
Unidentified Substance Containers	X	--	--
Stained Soil or Pavement	X	--	--
Stressed Vegetation	X	--	--
Pits, Ponds or Lagoons	X	--	--
Wastewater Discharges/Disposal Systems	X	--	--
Septic Systems/Cesspools	X	--	--
Non-Hazardous Solid Waste Disposal Areas	X	--	--
Drinking Water Systems/Water Wells	X	--	--
Other Wells	X	--	--

Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.

Hazardous Substances/Petroleum Products – Aboveground Storage Tanks - Waste Generation/Storage/Disposal

A 250-gallon aboveground storage tank (AST) containing diesel fuel was noted in the parking lot area at Site 1. The AST stores fuel for an emergency generator. The AST is staged on a concrete pad with curbs providing secondary containment. No suspect conditions (i.e. spills, stains or odors) were noted in the vicinity of the AST. An approximate 20-gallon red metal container containing waste kitchen grease was noted at the south side of the café building. The container appeared to be in good condition with no suspect conditions (i.e. spills, stains or odors) noted in the vicinity of the container. Retail sized containers of janitorial supplies were noted inside of the café building. The containers were properly labeled. No suspect conditions (i.e. spills, stains or odors) were noted in the vicinity of the containers.

Floor Drains/Sumps/Wells

Floor drains were noted within the restrooms and kitchen of the café building on Site 1. No suspect conditions (i.e. stains or odors) were noted in the vicinity of the floor drains.

PCB Containing Equipment

Two pad mounted electrical transformers were noted in the parking lot at Site 1. The transformers are utility owned (LADWP) and are not labeled with respect to PCB content. No suspect conditions were noted in the vicinity of the transformers.

Non-Hazardous Solid Waste Disposal Areas

AEC observed a compactor in the southwest corner of the parking lot at Site 1. No staining or other suspect conditions were noted in the area of the compactor.

Additional Services

Site 1: On July 8, 2017, Southwest Geophysics, Inc., a subcontractor to AEC, completed a geophysical survey at Site 1. The included studies of a concrete patio area and parking lot located on the site. The results of the survey of the patio area did not reveal the presence of a UST or possible excavation. However, variations to the subsurface features noted during the completion of this geophysical survey may exist. Uncertainties of subsurface conditions can be reduced through additional subsurface surveying and/or exploration. It should also be noted that geophysical surveys are limited by a variety of factors including soil type, cultural interferences and surface metal mass. It should be noted that while the conclusions of the Phase I ESA are in part based on the findings of the geophysical survey, the survey and AEC's report are not guarantees that a tank or tanks do not exist at the site. No additional services were completed by AEC as part of preparation of the Phase I ESA for Site 1. AEC concluded that the Phase I ESA revealed no evidence of RECs in connection with Site 1, and additional assessment of Site 1 was not determined to be warranted. To ensure that no significant impacts related to the potential UST, the Project Applicant would be required to implement Mitigation Measure HAZ-MM-1, which states that during excavation of Site 1 for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

Site 2: As stated previously, a Phase II ESA was completed concurrently with the Phase I ESA for Site 2. The subsurface evaluation was recommended due to the potential presence of lead impacted artificial fill material at the site and to further evaluate the extent of potential petroleum hydrocarbon and VOCs impacts at the site. The Phase II ESA included the completion of a geophysical survey in the northern portion of the site (former gasoline station area) using ground penetrating radar, electromagnetic technologies and other methods. The assessment also included the drilling of 10 soil borings to maximum depths of 20 feet below the surface and sampling of soil for total and soluble lead, petroleum hydrocarbons, and VOCs. In addition, soil gas probes were installed and soil gas samples were also analyzed for VOCs. In summary, the Phase II ESA concluded the following:

- The geophysical survey did not conclusively reveal the presence of USTs at the site.
- No significant soil impacts were identified during the assessment. However, the soil data gathered during the completion of the Phase II ESA will be utilized by the selected

grading/excavation contractor for development of Site 2 in evaluating disposal locations that may receive exported fill/soil from the site during future construction activities.

- Petroleum hydrocarbons and VOCs were not detected in any soil or soil gas samples analyzed during the Phase II ESA. As such, vapor intrusion is not an exposure pathway of significant concern at the site.
- All data obtained during the subsurface investigation was considered to be valid and useful for decision-making purposes. In addition, no upset conditions occurred during the sampling events or completion of the laboratory analysis that may have adversely influenced the results of the investigation.
- Additional assessment at Site 2 is not considered warranted.

Conclusion

Based on the information presented above, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

c) Would the project emit hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. No existing or proposed schools are located within one-quarter mile of the Project Sites. The closest school is the Para Los Niños Charter Middle School, located approximately 0.5 miles southeast of the Project Sites. Thus, the Project would not emit hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. As the Project would comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the Project would not adversely affect the Para Los Niños Charter Middle School. Therefore, impacts would be less than significant, and no further analysis is required.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

In 2015, the California Supreme Court in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a

hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Thus, in accordance with Appendix H of the State CEQA Guidelines and the *CBIA v. BAAQMD* decision, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the 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. Neither of the Project Sites is included on any list compiled pursuant to Government Code Section 65962.5.¹⁰⁰ As discussed in detail above in response to Checklist Question 8(b), the construction and operation of the Project would not create a significant hazard to the public or the environment, as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on this, development of the Project would not cause or exacerbate a significant hazard to the public or the environment. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are not located within two miles of a public airport. The closest airport is the Hollywood Burbank Airport located approximately 16.9 miles northwest of the sites. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Sites. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are not located within the vicinity of a private airstrip. The closest airport is the Hollywood Burbank Airport located approximately 16.9 miles northwest of the sites. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Sites. Therefore, no impacts related to this issue would occur.

¹⁰⁰ *Department of Toxic Substances Control, Envirostor*, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60001142, April 16, 2018.

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

Less Than Significant Impact. The City's 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, that identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element of the General Plan, the Project Sites are located along a designated disaster route (i.e., San Pedro Street).¹⁰¹

While it is expected that the majority of construction activities for the Project would be confined to the Project Sites, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Sites. Access to the Project Sites and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the LAFD and the LADBS to develop an emergency response plan for the Project in consultation with the LAFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan would ensure that Project impacts related to emergency response would be less than significant.

h) Would the project exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Sites are located in a highly urbanized area of the City that is not subject to wildland fires. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Implementation of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires, and no impacts would occur as a result of the Project.

Mitigation Measures (Hazards and Hazardous Materials)

HAZ-MM-1: During excavation of Site 1 for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a

¹⁰¹ *City of Los Angeles Department of Planning General Plan Safety Element, November 26, 1996, Exhibit H, Critical Facilities and Lifeline Systems.*

Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Sites and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Sites. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if the Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems, or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The

LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with these regulations would ensure construction and operational activities would result in less-than-significant impacts and would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. There are no permeable surfaces on the Project Sites. During a storm event stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Sites are not a source of groundwater recharge. Following redevelopment of the Project Sites, groundwater recharge would remain negligible, similar to existing conditions.

Based on the geotechnical investigations conducted for the Project Sites (refer to Appendix H1 and H2), and as discussed in in response to Checklist Question 6(a)(iii), the historically highest groundwater level in the area ranges from between approximately 85 feet and 95 feet beneath the ground surface. Groundwater was not encountered in borings drilled to a maximum depth of 50½ feet below the existing ground surface for Site 1 and 40 feet below the existing ground surface for Site 2. Based on the historic high groundwater levels in the site vicinity, the lack of groundwater in the borings, and the depth of proposed construction, groundwater is neither expected to be encountered during construction, nor have a detrimental effect on the Project. However, it is possible for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Should shallower or perched groundwater be encountered during Project construction, it would be pumped and discharged in accordance with all applicable LAWRQCB requirements, resulting in no impacts to groundwater supplies or water quality standards. Additionally, all water consumption associated with the Project would be supplied by LADWP and not from groundwater beneath the Project Sites. Thus, no impacts related to groundwater would occur as a result of the Project.

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

Less Than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the Project Sites or an existing stream or river, so that substantial erosion or siltation would result on-or off-site. The Project Sites are located in a highly urbanized area of the City. There are no natural watercourses on the Project Sites or in the vicinity of the sites. As discussed above, the Project Sites are developed with buildings and/or paved surfaces and are considered 100 percent impervious. Current stormwater runoff flows to the local storm drain system.

Under the post-Project condition, the Project Sites also would be considered 100 percent impervious, and drainage patterns would be much the same as under the existing condition. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities.

In addition, the Project would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Sites after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. A significant impact could occur if the Project resulted in increased surface water runoff volumes during construction, or if operation of the Project would result in flooding conditions affecting the Project Sites or nearby properties. Grading and construction activities on the Project Sites may temporarily alter the existing drainage patterns and reduce off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Impacts would therefore be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. A significant impact could occur if the Project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the

Project Sites, or if the Project would introduce substantial new sources of polluted runoff. Runoff from the Project Sites currently is and would continue to be collected on the sites and directed towards existing storm drains in the vicinity of the Project Sites, which include catch basins at the corners of South San Pedro Street and East 6th Street and Crocker Street and East 6th Street.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These "good-housekeeping" practices would ensure that short-term construction-related impacts would be less than significant.

Operation-Related Project Impacts

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

Activities associated with operation of the Project could generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Project must

comply with water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Through compliance with existing regulations and the approved LID Plan, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Construction related impacts would be less than significant.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains; however, during operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

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

No Impact. The Project Sites are not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).¹⁰² Thus, the Project would not place housing within a 100-

¹⁰² FEMA, <https://msc.fema.gov/portal/search?AddressQuery=350%20Hill%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor>, effective on 9-26-2008; and City of Los Angeles General Plan Safety Element, Exhibit F.

year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore, no impacts related to this issue would occur.

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

No Impact. As discussed above, the Project Sites are not located within a 100-year flood hazard area.¹⁰³ Thus, the Project would not place housing within a 100-year flood hazard area and structures would not impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. As discussed above, the Project Sites are not located within a designated 100-year flood plain. However, the Project Sites are identified in the Safety Element of the General Plan as being located in an area potentially susceptible to floods associated with a dam associated with the Hollywood Reservoir/Mulholland Dam.¹⁰⁴ However, the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing dam facilities. None of the 13 dams in the greater Los Angeles area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.¹⁰⁵

To further ensure against dam failure, the LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. LADWP conducts surveillance of the reservoirs as required by DSOD.¹⁰⁶ Thus, the Hollywood Reservoir/Mulholland Dam,

¹⁰³ *Ibid.*

¹⁰⁴ *Los Angeles General Plan Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas.*

¹⁰⁵ *Los Angeles General Plan Safety Element, Page II-16.*

¹⁰⁶ *Los Angeles Department of Water and Power, Water Infrastructure Plan 2016, http://ezweb.ladwp.com/UserFiles/Rates%20Documents/2016/Water_Infra_Plan_2016.pdf, accessed on April 17, 2018.*

as with other dams in California, is continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. As such, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the Project. Therefore, impacts related to flooding would be less than significant.

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

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Sites are located approximately 14 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Sites as being located within an area potentially affected by a tsunami.¹⁰⁷ Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Cumulative Impacts

The sites of the proposed Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. The Project Sites are located in a fully urbanized area of Los Angeles, in the Central City Community Plan Area. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. Specific uses surrounding the Project Sites include social services, warehouse, parking, and transitional housing land uses. A fully developed street network is located adjacent to the Project Sites and within the vicinity of the sites, along with all basic

¹⁰⁷ *Ibid.*

urban infrastructure systems. The Project would not create a physical barrier causing an impediment to travel or access the area surrounding the Project Sites. Rather, the Project includes removal of the existing land uses from the Project Sites and development of the sites with residential and commercial land uses. There would be no impact involving a physical separation of or other disruption to the physical structure of adjacent properties or the surrounding community, as development of the Project would occur within the boundaries of the existing Project Sites. Thus, the Project would not physically divide, disrupt, or isolate an established community. Therefore, no impacts related to this issue would occur.

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

Less Than Significant With Mitigation Incorporated. As discussed below, with mitigation, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Sites. Therefore, Project impacts related to land use and planning would be less than significant.

Regional

Southern California Association of Governments

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

SCAG Regional Comprehensive Plan

SCAG has prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.¹⁰⁸ The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

¹⁰⁸ 2008 Regional Comprehensive Plan, SCAG, <http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP>.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2016-2040 RTP/SCS (discussed below),

SCAG 2016-2040 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector.¹⁰⁹ It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.¹¹⁰

On April 7, 2016, the Regional Council of SCAG adopted the 2016-2040 RTP/SCS. For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. Through the 2016-2040 RTP/SCS SCAG continues to emphasize sustainability and integrated planning, whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2016-2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Federal Clean Air Act. As such, the 2016-2040 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2016-2040 time frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The

¹⁰⁹ *AB 32 was signed into law in 2006 and focuses on achieving GHG emissions equivalent to statewide levels in 1990 by 2020.*

¹¹⁰ *CARB, Executive Order No. G-11-024, Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

2016-2040 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development.

The 2016-2040 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2016-2040 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2016-2040 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the State, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2016-2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2040. More importantly, the 2016-2040 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2016-2040 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2016-2040 RTP/SCS is included in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis). As discussed there, the Project would be substantially consistent with the applicable 2016-2040 RTP/SCS policies and with the general use designation, density, and building intensity identified in the 2016-2040 RTP/SCS for the area in which the Project Sites are located.

While the Project is consistent with the SCAG 2016-2040 RTP/SCS, the Project is not consistent with the City's current land use and zoning designations for the Project Sites. As such, a General Plan Amendment, Zone Change, and Height District Change are required. The SCAG 2016-2040 RTP/SCS recognizes that land uses authorized under the 2016-2040 RTP/SCS may be inconsistent with existing land use plans, policies, and regulations of an agency with jurisdiction over a project and identified mitigation measure MM-LU-1(b) (listed below) to address and avoid or reduce potential significant effects of such inconsistency to less than significant levels.

- MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

This mitigation measure permits a local agency to resolve the inconsistency between the general use designations under the SCAG 2016-2040 RTP/SCS and the adopted general plan with an amendment to the general plan and related zoning where the local agency finds that the environmental, social, economic, and engineering benefits of a project warrant a variance from the City's adopted general plan and zoning designations. Implementation of MM-LU-1(b) and approval by the City of a general plan amendment and zone change would allow the Project to proceed in a manner consistent with both the 2016-2040 RPT/SCS and the City's General Plan land use designation and zoning for the Project Sites. The discussion regarding implementation of this mitigation measure and the environmental, social, economic, and engineering benefits of the Project is provided, below.

Site Context

The Project Sites are located within the Skid Row area of Downtown Los Angeles within the Central City Community Plan area of the City's General Plan Land Use element. Skid Row, a former industrial manufacturing center, has over the last half-century experienced an exodus of heavy, medium and light industry from the area. Industry in Los Angeles County has decentralized, moving to places like Commerce and further east into San Bernardino County. Skid Row has seen a spillover of neighboring residential and commercial neighborhoods including the Historic Core and Little Tokyo, where the borders between these neighborhoods have been blurred. In addition, the neighborhood has seen an increase in homelessness and homeless services, including shelters, clinics, transitional and permanent supportive housing, and provision of social services such as rehabilitation and jobs training.

Homelessness is not specific to Skid Row. Los Angeles is facing a homelessness epidemic, with approximately 60,000 persons in Los Angeles County experiencing homelessness on any given night and the highest density of these individuals is in central Los Angeles.¹¹¹ Homelessness in Los Angeles County has increased nearly 25 percent since 2016.¹¹² The homelessness problem is compounded by the housing crisis, which Los Angeles is also experiencing. In Los Angeles County, approximately 600,000 people are considered severely rent burdened, meaning they spend half of their income on rent. Furthermore, more than 8,000 people became homeless in Los Angeles for the first-time last year.¹¹³ The County of Los Angeles is woefully short on affordable housing, needing an overwhelming 551,807 new units of affordable housing to satisfy demand from very low and extremely low-income individuals.¹¹⁴

¹¹¹ *The Greater Los Angeles Homeless County, Homeless Count 2017 Los Angeles County Fact Sheet, Los Angeles Homeless Services Authority, <https://www.lahsa.org/homeless-count/>, accessed May 2018.*

¹¹² *Ibid.*

¹¹³ *Ibid.*

¹¹⁴ *Los Angeles County Renters in Crisis: A Call for Action, California Housing Partnership, May 2017.*

City Policies to Address Homelessness and to Create Affordable Housing

The City is creating policies to address the homeless and housing crises. Voters recently approved Measure H (a County-wide ballot measure) and Proposition HHH (a City ballot measure) to implement sales taxes that will help fund homeless services and homeless housing. Measure H aims to do several things to increase services for homeless, including but not limited to development of outreach teams comprised of case workers and health specialists, temporary bridge housing, a rapid rehousing program and the provision of supportive services like job training, substance abuse counseling, and mental health treatment.¹¹⁵ Proposition HHH will incur a new property tax that will fund the Proposition HHH Permanent Supportive Housing Loan Program which emphasizing reducing homelessness by providing funding to create safe and affordable housing units, and increasing accessibility to a variety of services and treatment programs within these permanent supportive housing Projects.¹¹⁶

In addition to these homelessness initiatives, there are several other City initiatives aimed at the creation of affordable housing that have been recently adopted or are in process. Mayor Eric Garcetti issued Executive Directive 13: Support for Affordable Housing, which aims to issue permits for 100,000 new housing units in the City by 2021, ensuring that at least 15,000 of those units are set aside as affordable units for low-income households. The City Council recently adopted the Affordable Housing Linkage Fee. The linkage fee is based on the nexus between the development of nonresidential and market rate Projects and the increased need to provide affordable housing. The linkage fee will be charged to project applicants commensurate with the characteristics of each project. Proceeds will be used to preserve existing affordable housing covenants and develop new affordable housing Projects.¹¹⁷ In addition, each Councilmember has pledged to back the approval of at least 222 units of supportive housing in their district before July 1, 2020. Furthermore, the City recently implemented the Transit Oriented Communities Guidelines, which create incentives to produce housing near transit in return for incorporation of affordable housing in these Projects.

The Department of City Planning is also undertaking DTLA 2040, which involves an update of the Central City and Central City North Community Plans and would modify the land use designations and zoning for Downtown Los Angeles. DTLA 2040 began in 2014 and is currently in the environmental review process. The Department of City Planning expects publication of the Draft Environmental Impact Report by Summer 2018. Once the project completes environmental review, the adoption process for DTLA 2040 will begin. As part of the Community Plan Update process, the City is evaluating the re-designation of land that is currently designated for manufacturing and heavy industrial uses to different designations that could accommodate housing, general commercial uses, and other new industries.

¹¹⁵ *Los Angeles County Homeless Initiative –FY 2018-19 Draft Measure H Funding Recommendations.*

¹¹⁶ *Supportive Housing (Prop HHH), Los Angeles Housing and Community Investment Department*

¹¹⁷ *City of Los Angeles Ordinance No. 185,342*

Incompatibility of Project Area and Project Sites with existing Manufacturing Land Use and Zoning Designations

The Project Sites are not a viable location for manufacturing uses. As Skid Row exists today, there is already a high density of housing and social services provided in industrially zoned land which is incompatible with the area's manufacturing land use designation and zoning. In general, much of this area is incompatible with the manufacturing land use designation. Industry has changed over the past decades and no longer aligns with the land use characteristics of heavy manufacturing of the first half of the 20th century. Industry in Los Angeles is no longer focused on manufacturing of products to be used in mass production, but instead focused on providing services and creating content such as film production, music studios, fashion industries, etc. Additionally, the developable sites in the Skid Row area are not suitable for industrial development from a size and cost perspective. The majority of the land parcels in the area are small, less than an acre. Many land parcels would need to be assembled in order to create a viable manufacturing development site, in an area where land costs are very high. In addition, the infrastructure in the area is not adequate for industrial uses. Roads are narrow, old, and congested and cannot accommodate typically large delivery trucks. Utilities have also not been updated in nearly a century and cannot support the utility demands of modern day manufacturing uses without adding significant redevelopment costs. Industry instead has moved to places like San Bernardino County where land is readily available and inexpensive compared to the central core of Los Angeles and where utilities can be easily installed to accommodate manufacturing.

The Project Sites could not support the development of a factory or other manufacturing center as it is not large enough to accommodate factory buildings and truck loading and the utility systems would require significant upgrades for modern industrial uses.

In addition, the Department of City Planning issued *Downtown Industrial Core: Data and Recommendations*, which are intended to maintain industrial and manufacturing uses in areas zoned for such uses in the City. However, that policy contains an exception for affordable housing, by recommending to “Reinforce Community Plan objectives and policies to allow permanent supportive housing and assure no net loss of affordable housing” near the Project Sites.¹¹⁸

In light of the incompatibility of the Project Sites for industrial and manufacturing uses, the Project Sites are likely to remain in its current, underutilized condition in the absence of general plan amendment and zone change. The requested General Plan Amendment to Regional Center Commercial and Zone and Height District Change to C2-4D in a manner consistent with the Urban Land Development Category in the 2016-2040 RTP/SCS and the designation of the area as a High Quality Transit Area (HQTA) and consistent with the *Downtown Industrial Core: Data and Recommendations adopted as guidelines by the City Planning Commission*. While that policy was never adopted by the City Council, the Project is nevertheless consistent with the policy, which contained an exception for affordable housing, by recommending reinforcing Community Plan objectives and policies to allow permanent supportive housing and assure no net loss of affordable housing in the area of the Project Sites. In addition, the City Planning Commission previously approved an industrial land use policy that was intended to maintain

¹¹⁸ *Department of City Planning, Downtown Industrial Core: Data and Recommendations*

industrial and manufacturing uses in areas zoned for such uses in the City, including the area of Downtown Los Angeles encompassing the Project Sites.¹¹⁹ The proposed high-density mixed-use Project would also be consistent with the numerous City ordinances, plans and policies enumerated above, by addressing homelessness and providing new, much needed permanent supportive and affordable housing for homeless (including individuals and families) and including social service components, consistent with Measure HHH, to support future residents.

Environmental Benefits of Project

The Project would benefit the environment in several ways that support the City's and the 2016-2040 RTP/SCS sustainability goals and warrant a variance from the existing General Plan and zoning designations for the Project Sites. Importantly, the Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project has very little parking for the residential uses and instead focuses on providing ample bicycle parking and infrastructure to further disincentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels on the roof levels. Additionally, the Project would incorporate approximately 34,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant approximately 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.

These positive environmental impacts of the Project are in alignment with the City's *Plan for a Healthy LA*, which is a recently adopted element of the General Plan. Main tenets of the *Plan for a Health LA* include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.¹²⁰ For these reasons, the requested General Plan Amendment and rezoning are warranted due to the environmental benefits the Project would bring to the area and the City.

Social Benefits of the Project

The Project also would create many social benefits to the City that support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. Los Angeles is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets

¹¹⁹ *City of Los Angeles, Downtown Industrial Core: Data and Recommendations, December 2006.*

¹²⁰ *Plan for a Healthy LA, Department of City Planning, March 2015.*

and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The *Plan for a Healthy LA* also sets out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives.¹²¹ The Project would include approximately 26,000 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and Internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This goal is in alignment with the *Plan for a Healthy LA*, along with Measure H which aims to rehabilitate homeless individuals so that they may rejoin society. This would be a direct social benefit. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the social benefits the Project would bring to the area and the City.

Economic Benefits of the Project

The Project would create economic benefits that support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. The Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy creating new workers who would in turn have increased spending power and therefore increase their economic consumption. The Project would also create approximately 22,500 square feet of new commercial, retail and office uses that would contribute to the economy by creating new businesses, jobs and sales tax revenue. Additionally, the Project would create a well-built and attractive buildings in the Skid Row area akin to a market-rate apartment development that would increase the aesthetic appeal of the area and in turn increase the attractiveness for new economic development in the area. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the economic benefits the Project would bring to the area and the City.

Engineering Benefits of the Project

The Project would create engineering benefits, which support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. The Project would be built to the most current building codes that would assist in protecting residents from earthquake and other geologic impacts and would require sustainability measures such as low flow fixtures and energy efficient building systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels that would capture solar energy to create electricity for the Project. Accordingly, the Project would create engineering benefits that merit a Zone Change and General Plan Amendment. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the engineering benefits the Project would bring to the area and the City.

Overall, the Project's environmental, social, economic and engineering benefits would create engineering benefits which support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and

¹²¹ *Ibid.*

land use designations for the Project Sites as stated above. In light of the environmental, social, economic and engineering benefits of the Project, existing City plans and policies, and draft plans and policies for Downtown Los Angeles and the Project Sites, a variance from the adopted general plan and zoning for the Project Sites is warranted and with implementation of MM-LU-1(b) of 2016-2040 RTP/SCS, the Project is consistent with the 2016-2040 RTP/SCS.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 citywide elements.

City of Los Angeles Framework Element

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address land use and serves as a guide for updating the community plans and the citywide elements. The Framework Element provides a base relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, while the community plans determine the specific land use designations of individual parcels.

Project Consistency Discussion

The Project's consistency with the General Plan Framework Element land use policies is provided in Table 6-36. As shown therein, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts regarding consistency with this plan would occur. Although the Project is consistent with the SCAG 2016-2040 RTP/SCS and the City's General Plan and zoning, MM-LU-1(b) is nonetheless incorporated in order to address any potential inconsistencies between the 2016-2040 RTP/SCP and the adopted general plan land use designation and zoning for the Project Sites.

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
<i>Framework Element: Land Use Chapter</i>	
<p>3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles.</p> <p>In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.</p>
<p>3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Additionally, the Project includes 493 secure bicycle parking spaces.</p> <p>In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.</p>

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
<p>3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.</p>	<p>Consistent. The area of the Project Sites experiences a high level of pedestrian activity, particularly along the key corridors, such as South San Pedro Street and 6th Street near the Project Sites. Based on the existing level of pedestrian activity in the area and the proximity of transit and sources of employment and retail opportunities, it is anticipated that there would continue to be a high level of pedestrian activity in the area as well as to and from the Project Sites.</p> <p>The Project would be designed to encourage pedestrian activity and walking and cycling as a transportation mode. The Project would be designed to provide connections to the adjacent public sidewalks and would include site enhancements to promote walkability. The Project Sites would be accessible from nearby public bus and rail transit stops as well as other amenities along nearby major corridors. The majority of pedestrian access to the Project Sites would occur via the existing public sidewalks provided along every street in the Downtown Los Angeles area.</p> <p>Use of bicycles as a transportation mode to and from the Project Sites would be encouraged as part of the Project by the provision of ample and safe parking. The type of spaces and dimensions would be provided based on LAMC Sections 12.21 A.16 and 12.21 A.4(c), as well as to meet the needs of a variety of bicycles. The bicycle spaces would be provided in a readily accessible location(s). Appropriate lighting would be provided to increase safety and provide theft protection during nighttime parking. The short-term and long-term bicycle parking requirements of the LAMC would be satisfied both for the residential and commercial land use components of the Project.</p>
<p>3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQT, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project</p>

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
	<p>Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Additionally, the Project includes 493 secure bicycle parking spaces.</p> <p>In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.</p>
<p><i>Source: City of Los Angeles General Plan.</i></p>	

City of Los Angeles Health and Wellness Element

The Plan for a Healthy Los Angeles (Plan) lays the foundation to create healthier communities for all residents of the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

With a focus on public health and safety, the Plan provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive.

The Plan accomplishes two policy objectives: it elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City.¹²²

¹²² *Implementation of the Plan is addressed through programs, ordinances, and Community Plans, among other planning policy documents, which allow for the flexibility needed to address the specific needs of the City's diverse communities. References to neighborhoods usually reflect the Community Plan Area boundaries used by the Department of City Planning, but the City recognizes the fluidity and diversity of the City's neighborhoods.*

Project Consistency Discussion

The Project's consistency with the General Plan Health and Wellness Element land use policies is discussed on Table 6-37. As shown therein, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts with respect to consistency with this plan would occur.

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
<p>1.3 Promote healthy communities by focusing on prevention, interventions, and by addressing the root causes of health disparities and inequities in Los Angeles.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction..</p> <p>The Project would be designed to encourage pedestrian activity and walking as a transportation mode. The Project would be designed to provide connections to the adjacent public sidewalks and would include site enhancements to promote walkability. The Project Sites would be accessible from nearby public bus and rail transit stops as well as other amenities along nearby major corridors. The majority of pedestrian access to the Project Sites would occur via the existing public sidewalks provided along every street in the Downtown Los Angeles area.</p> <p>Use of bicycles as a transportation mode to and from the Project Sites would be encouraged as part of the Project by the provision of ample and safe parking (493 spaces). The type of spaces and dimensions would be provided based on LAMC Sections 12.21 A.16 and 12.21 A.4(c), as well as to meet the needs of a variety of bicycles. The bicycle spaces would be provided in a readily accessible location(s). Appropriate lighting would be provided to increase safety and provide theft protection during nighttime parking. The short-term and long-term bicycle parking</p>

**Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element**

Policy	Project Consistency
	requirements of the LAMC would be satisfied both for the residential and commercial land use components of the Project.
<p>1.5 Improve Angelenos’ health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>Consistent. The Project would benefit the health and well-being of City residents in several ways. The Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.</p> <p>These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.</p> <p>The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and</p>

**Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element**

Policy	Project Consistency
	<p>providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.</p>
<p>2.1 Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.</p>	<p>Consistent. The Project would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.</p>
<p>2.2 Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.</p>	<p>Consistent. The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than</p>

**Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element**

Policy	Project Consistency
	<p>13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.</p> <p>These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.</p> <p>The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.</p>
<p>2.3 Strive to eliminate barriers for individuals with permanent and temporary disabilities to access health care and health resources.</p>	<p>Consistent. Design of the Project would comply with all existing federal, state, and local regulations including the Americans with Disabilities Act.</p>
<p>2.11 Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure</p>	<p>Consistent. The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart</p>

**Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element**

Policy	Project Consistency
<p>deficiencies that threaten the health, safety, and well-being of the most vulnerable users.</p>	<p>growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low -low fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.</p> <p>These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.</p> <p>The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is</p>

**Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element**

Policy	Project Consistency
<p>3.8 Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across ages and level of abilities.</p>	<p>to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.</p> <p>Consistent. The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.</p> <p>These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.</p> <p>The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and</p>

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	<p>providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.</p>
<p>5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.</p>	<p>Consistent. The Project is an infill development that includes redevelopment of the Project Sites in Downtown Los Angeles with a mixed-use development, including residential housing and commercial land uses to serve an existing homeless population. The Project would reduce dependence on car travel and air pollutants generated by car traffic through the Project Sites' proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. Finally, the Project would encourage bicycling with the inclusion of 493 bicycle parking spaces and a bicycle repair station.</p>
<p>5.3 Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.</p>	<p>Consistent. The Project would reduce exposure to second-hand smoke in accordance with applicable law.</p>
<p>5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.</p>	<p>Consistent. As discussed in response to Checklist Question 3(d), the Project would not expose sensitive receptors to pollutant emissions in excess of SCAQMD's significance thresholds.</p> <p>Also, the Project's commercial uses would not include hazardous materials, such as a dry cleaner.</p> <p>As discussed in response to Checklist Question 3(e), the Project would not result in any impacts related to odors.</p>

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
<p>5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p>Consistent. As discussed in response to Checklist Question 7(a), the mixed-use nature of the Project, its proximity to transit, and compliance with the City’s Green Building Code would reduce the Project’s GHG emissions profile and the Project would be consistent with applicable GHG reduction plans and strategies. As discussed in in detail there, Project impacts related to GHG emissions would be less than significant.</p>
<p>7.2 Continue to promote the development and implementation of comprehensive strategies that foster safe passages in neighborhoods with high crime and gang activity to ensure that all Angelenos can travel with confidence and without fear.</p>	<p>Consistent. The Project would include adequate lighting provided (in accordance with LAMC requirements, including LAMC Section 91.8607) to ensure safe lighting for pedestrian paths. Numerous windows would be located on the streets surrounding the Project Sites, as well as along the Project’s internal circulation, placing “eyes on the street.” Additionally, prior to issuance of a building permit, the Project Applicant would be required to coordinate with the Los Angeles Police Department (LAPD) and incorporate all safety features into the design of the Project to maximize safety at the Project Sites.</p>
<p><i>Source: City of Los Angeles, Health and Wellness Element of the General Plan, March 2015.</i></p>	

Central City Community Plan

The Central City Community Plan (Community Plan) area is located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110) and west of Alameda Street. It is bordered by the community plan areas of Central City North, Silver Lake-Echo Park-Elysian Valley, Westlake, Southeast Los Angeles, and South Los Angeles. Central City is the City’s second smallest community plan area, representing less than one percent of the land in the City (approximately 2,161 acres or 3.38 square miles). Since this area is the governmental, financial, and the industrial hub of Los Angeles, land has primarily been dedicated to these uses. Consequently, this area has a smaller residential population in comparison with the rest of the City, though dwelling units and resident population are growing as people find a renewed interest in urban living and existing vacant and often historic commercial and industrial buildings are being converted to residential uses.

The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible.

The current land use designation for the Project Sites in the Community Plan is Light Manufacturing (refer to Figure 2-2 in Section 2 [Project Description]).

Project Consistency Discussion

As discussed on Table 6-38 and below, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts regarding consistency with this plan would occur.

Table 6-38
Project Consistency with the Community Plan

Guideline	Consistency Discussion
<p><i>Residential</i></p> <p>1-1.1 Maintain zoning standards that clearly promote housing and limit ancillary commercial to that which meets the needs of neighborhood residents or is compatible with residential uses.</p>	<p>Consistent. The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTAs, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles.</p> <p>The Project includes neighborhood-serving, ground floor retail, similar to other retail land uses provided in the vicinity of the Project Sites. Additionally, consistent with other services provided near the Project Sites, the Project includes office and philanthropic uses to support the Project's residential population. Philanthropic uses include: game rooms, gyms, group space, counseling, computer rooms, classrooms, and kitchen and dining.</p> <p>Of the 382 residential dwelling units proposed on Site 1, 378 residential dwelling units would be designated restricted affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20 percent would be set aside for individuals and families.</p> <p>Of the 303 residential dwelling units proposed on Site 2, 303 residential dwelling units would be designated restricted affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families.</p> <p>The Project would be compatible with other high-rise mixed-use/residential building in the vicinity of the Project Sites.</p>
<p>1-5.1 Monitor the supply of low-income housing stock to guard against loss of units through demolition, conversion, and deterioration of units.</p>	<p>Consistent. No housing is located on the Project Sites. Thus, the Project would not cause the loss of any affordable housing. Instead, 378 of the proposed 382 residential dwelling units developed on Site 1 would be designated restricted affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20</p>

Table 6-38
Project Consistency with the Community Plan

Guideline	Consistency Discussion
	<p>percent would be set aside for individuals and families.</p> <p>Of the 303 residential dwelling units developed on Site 2, 298 residential dwelling units would also be designated restricted affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families.</p>
Commercial	
2-1.2 To maintain a safe, clean, attractive, and lively environment.	Consistent. The Project includes infill development of new multi-family residential and commercial land uses that are needed in the area of the Project Sites. The Project would include on-site maintenance and security systems. The Project would be designed and constructed to meet the City's design and landscaping standards.
2-2.1 Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force, and businesses.	Consistent. The Project includes neighborhood-serving retail that would support the proposed residential land uses and would provide employment.
2-2.3 Support the growth of neighborhoods with small, local retail services.	Consistent. The Project includes neighborhood-serving retail that would support the proposed residential land uses, as well as existing residents in the area of the Project Sites.
Police Protection	
5-1.1 Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.	Consistent. The LAPD was consulted in preparation of this SCEA (refer to Appendix L). As discussed in response to Checklist Question 14(a)(ii), Project impacts related to LAPD services would be less than significant.
5-2.1 Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	Consistent. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits.
Fire Protection	
6-1.1 Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.	Consistent. The LAFD was consulted in preparation of this SCEA (refer to Appendix L). As discussed in response to Checklist Question 14(a)(i), Project impacts related to LAFD services would be less than significant.
<i>Source: City Central Community Plan.</i>	

The Project Applicant is requesting General Plan Amendments for both Site 1 and Site 2 to amend the land use designation in the Community Plan from Light Manufacturing (corresponding to the M2 Zone) to the Regional Center Commercial (corresponding to the C2 Zone) and to amend Footnote 3 of the Community Plan to permit the Project to exceed the 6:1 FAR limitation. (As part of the discretionary requests for the Projects, the Project Applicant is also requesting Zone Changes/Height District Changes

from the M2-2D Zone to the C2-4D Zone for both sites. The findings for the requested Zone and Height District Changes are addressed below.)

The requested General Plan Amendments from Light Manufacturing to Regional Center Commercial and amendment to Footnote 3 would create development sites that are compatible with the Community Plan's description of the Central City East neighborhood as the location for approximately 6,500 single-room occupancy (SRO) hotel units that are "the primary source of housing for the area." In addition the Project Applicant's request to amend Footnote 3 of the Central City Community plan would allow the Project to exceed a 6:1 Floor Area Ratio without utilizing a Transfer of Development Rights, consistent with Government Code 65915(k) to allow a 35 percent increase in the FAR to 8.1:1. The Community Plan notes that in an effort to "foster the development of a residential neighborhood, Central City East has been targeted as a priority intervention area for the rehabilitation of the area's SRO hotels."¹²³ The Community Plan also observes that the area of the Project Sites is a center of social services including alcohol treatment programs and mental health services, and that the area includes such programs as job training, transitional housing, and homeless outreach.

The Projects would help to foster the development of a residential neighborhood by demolishing an aging food service building and surface parking lot at Site 1 and a surface parking lot at Site 2 to construct a mixed-use development with supportive services for the residents. The new modern residential units, which would remain deed restricted, would ensure the primary source of housing in the area is maintained well into the future. In fact, the Projects would increase the unit count in the area by 685 residential units. The Projects proposes to be a well-designed building with attractive architectural features that would provide permanent affordable housing for Very Low Income and homeless persons in a maximum of 676 Restricted Affordable Efficiency Dwelling Units. Site 1's frontage on South San Pedro Street and Crocker Street would be enhanced with large, transparent windows that create an inviting pedestrian experience to activate the streets.

Downtown Design Guide: Design for a Livable Downtown

The Downtown Design Guide: Design for a Livable Downtown (Downtown Design Guide) is an interdepartmental project among Department of City Planning, Community Redevelopment Agency, LADOT, and Public Works. Together with urban design, transportation and environmental consultants, the Urban Design Studio, City developed the Downtown Design Guide to advance new context-sensitive street standards which emphasize walkability, sustainability and transit options; and simple but critical urban design standards to reinforce the community character of Downtown Los Angeles' many neighborhoods and districts. The purpose of the Downtown Design Guide is to coordinate and orchestrate the overall development of the City core, so that projects help each other succeed and result in a better, livable downtown. The Downtown Design Guide is intended to provide guidance for creating a livable downtown.

¹²³ *Central City Community Plan, page I-10.*

Project Consistency Discussion

As part of the Project's Application, the Project Applicant was required to complete a copy of the Downtown Design Guide Checklist, which includes all of the design guidelines from the Downtown Design Guide and an indication (checkmark) of whether the Project complies or does not comply with each design guideline or whether the design guideline is not applicable to the Project. The Project Applicant must provide a written justification for any instances where the Project does not comply with a particular design guideline or where the design guideline is not applicable. Planning staff has reviewed the Downtown Design Guide Checklist in light of the design and architecture of the Project (refer to Appendix J) and has determined that the Project does comply with the Downtown Design Guide.

City of Los Angeles General Provisions and Zoning Code

All development activity on the Project Sites is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (Zoning Code). The Zoning Code includes development standards for the various districts in the City. As shown on Figure 2-3 in Section 2 (Project Description), the Project Sites are currently zoned M2-2D (Light Industrial Zone, Height District 2, Development Limitation). Footnote 2 in the Community Plan indicates that the Project Sites "correspond to Height District No. 2-D for commercial, industrial, and public facilities zones; D Limitation to 3:1 floor area ratio (FAR), except for transfer of floor area of up to 6:1 FAR.

Project Consistency Discussion

The Project Applicant is requesting Zone and Height District changes from the M2-2D to the C2-4D Zone for Sites 1 and 2, in conjunction with the requested General Plan Amendments from Light Manufacturing to Regional Center Commercial. As shown on the Land Use Map of the Community Plan, the C2 Zone is one of the corresponding zones of the Regional Center Commercial land use designation.

The existing M2 Zone permits existing industrial and commercial buildings, subject to regulations, to be adaptively reused to contain residential dwelling units. The zone does not permit the construction of residential dwelling units in new, ground-up developments. The requested C2 Zone would permit the development of the Project Sites with newly constructed buildings to house up to 685 residential dwelling units, of which 676 would be set aside as Restricted Affordable Housing. The proposed development of the Project Sites would be consistent with the existing development of the Central City East district, as described in the Community Plan text, which is developed primarily with SRO units and supportive services.

In conjunction with the requested zone change, the Project Applicant is requesting a Height District Change to change the existing Height District from 2D to 4D. The Project Sites are subject to the Development "D" Limitations contained within Ordinance No. 164,307, Subarea 1295, which restricts the maximum FAR for the site to 3:1, in lieu of the maximum permitted 6:1 FAR allowed in Height District No. 2. The requested Height District would change existing Height District to Height District No. 4, with consideration of a D Limitation restricting the FAR limitations to that of the two Projects. The Project on Site 1 would have a maximum 8.1:1 FAR, while the Project on Site 2 would have a maximum 3.5:1 FAR.

Although the Project is consistent with the SCAG 2016-2040 RTP/SCS and the City's General Plan and zoning, MM-LU-1(b) is nonetheless incorporated in order to address any potential inconsistencies between the 2016-2040 RTP/SCP and the adopted general plan land use designation and zoning for the Project Sites.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. There are no significant ecological areas (SEAs) and/or other biological resources on and/or near the Project Sites.¹²⁴ Thus, development of the Project Sites would not subject to any applicable habitat conservation plan or natural community conservation plan. Thus, the Project would not conflict with any applicable habitat conservation plan or natural community conservation plan, and no impacts related to this issue would occur.

Mitigation Measures (Land Use and Planning)

To ensure that the Project impacts related to land use and planning would be less than significant, implementation of the following mitigation measure is required:

MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Sites. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

11. MINERAL RESOURCES

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

No Impact. The Project Sites are located in an urbanized area of the City. There are no known mineral resources on the Project Sites or in the vicinity.¹²⁵ The project sites are currently zoned M2-2D and the

¹²⁴ *City of Los Angeles General Plan Conservation Element, Exhibit B2.*

¹²⁵ *City of Los Angeles General Plan, Conservation Element, Exhibit A.*

applicant has requested an amendment to the land use designation and requested a zone change to C2-4D. Thus, the project sites would not be zoned for oil extraction and drilling, or mining of mineral resources, and there are no such sites at the Project Sites. Further, the Project Sites are not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.¹²⁶ Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. The Project Sites are not identified as a mineral resource recovery site.¹²⁷ Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

12. NOISE

The information and analysis presented in this section is based primarily on the following (refer to Appendix K):

- *Noise Modeling Results, Weingart Projects, DKA Planning, March 2018.*

Introduction to Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 6-39 provides examples of A-weighted noise levels from common sources.

¹²⁶ *City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>*

¹²⁷ *Ibid.*

Table 6-39
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
<i>Note: The noise levels presented on this table are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis, but are provided for the reader to gain a rudimentary concept of various noise levels.</i>	
<i>Source: Cowan, James P., Handbook of Environmental Acoustics, 1993.</i>	

Noise Definitions

This noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL).

Equivalent Noise Level: L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period. L_{eq} is expressed in units of dBA.

Community Noise Equivalent Level: CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Regarding construction noise emissions, it should be noted that maximum noise levels (L_{max}) only occur when equipment is operating under full power conditions. However, construction equipment rarely operates at full power and intensity for extended durations. Because of this, the average (hourly L_{eq}) noise levels of equipment are generally utilized to more accurately characterize the effect of construction noise, as the L_{eq} metric accounts for typical usage patterns and other factors. For example, though an auger drill

rig may produce a maximum, peak noise level of 84.4 dBA L_{max} , an auger drill would not be operated continuously and at full power over the course of any hour of work. Instead, it would operate intermittently before moving to drill a new location. Therefore, an hourly average L_{eq} would better account for this equipment's pattern of use.

The CNEL metric is utilized almost exclusively to characterize 24-hour noise impacts from operations, including traffic noise levels. Construction activities generally do not occur during the evening, nighttime, and early morning periods when CNEL adjusts for increased human noise sensitivity.

Effects of Noise

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

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.¹²⁸ The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.¹²⁹

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq} , and that individual noise events of 45 dBA or higher be limited.¹³⁰ Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq} . Individual exterior events of 60 dBA or higher should also be limited.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65-70 dBA L_{eq} and cardiovascular effects including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can

¹²⁸ National Institute on Deafness and Other Communication Disorders, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

¹²⁹ World Health Organization, *Guidelines for Community Noise, 1999*.

¹³⁰ *Ibid.*

provoke a community response.¹³¹ However, few people are highly annoyed at noise levels below 55 dBA L_{eq} .¹³²

Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as “point sources,” can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA.¹³³ However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or the long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated by and evaluated with respect to state and City standards designed to protect public well-being and health.

State

The State’s 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table 6-40 illustrates State compatibility considerations between various land uses and exterior noise levels.

¹³¹ *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.*

¹³² *World Health Organization, Guidelines for Community Noise, 1999.*

¹³³ *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table 6-40
State of California Noise/Land Use Compatibility Matrix

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---
<p>^a <i>Normally Acceptable:</i> Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.</p> <p>^b <i>Conditionally Acceptable:</i> New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.</p> <p>^c <i>Normally Unacceptable:</i> New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.</p> <p>^d <i>Clearly Unacceptable:</i> New construction or development should generally not be undertaken.</p>				
<p>Source: California Office of Planning and Research, General Plan Guidelines – Noise Element Guidelines (Appendix E), Figure 2, 2017.</p>				

City

Los Angeles General Plan Noise Element

The City’s General Plan includes a Noise Element that identifies policies and standard to guide for the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts that preserve acceptable noise environments for all types of land uses. However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a proposed project’s noise impacts. Instead, it adopts the State’s guidance on noise and land use compatibility, shown on Table 6-40, “to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels.”

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

- (a) *No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
- (c) *No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...*

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

- (a) *It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*
- (b) *Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any*

residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

- (c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.*

Section 112.02(a), below, would prevent Project heating, ventilation, and air conditioning (HVAC) systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC. 112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

- (a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property ... to exceed the ambient noise level by more than five decibels.*

Los Angeles CEQA Thresholds Guide

The City's 2006 L.A. CEQA Thresholds Guide (Threshold Guide) provides guidance for the determination of significance for construction and operational noise impacts. It should be noted that the Threshold Guide is "intended to be available as a voluntary tool" that serves as "a guidance document that draws together practical information" to "streamline and enhance the City's permit and development processes." The Threshold Guide further explains that "[i]t recognizes that the impacts resulting from a particular action depend on the project setting, design, and operational components and that the determination of significance and the appropriate criteria for evaluation are the responsibility of the lead agency." According to the Threshold Guide, a project would, under normal circumstances, have a significant impact from construction noise sources if the following occurred:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*
- *Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*
- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.*

Construction of the Project is anticipated to require approximately 49 months to complete. Thus, the significance criteria used in the construction noise analysis presented below is the increase in the ambient exterior noise levels of 5 dBA (hourly L_{eq}) or more at a noise-sensitive use.

For operational noise sources, a Project would have a significant impact if it were to cause:

- *The ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category...*
- *Any 5 dBA or greater increase.*

These “normally unacceptable” and “clearly unacceptable” categories refer to those outlined by the State’s noise and land-use compatibility chart, shown on Table 6-40.

Existing Conditions

According to the Thresholds Guide, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project Sites:

Charles Cobb Apartments – 521 S. San Pedro Street

This residential land use is located approximately 260 feet north of Site 1 and approximately 560 feet north of Site 2.

Union Rescue Mission – 545 S. San Pedro Street

This receptor consists of a homeless shelter and related uses that would be considered sensitive to noise (e.g. homeless temporary/supportive housing). It is located approximately 105 feet northwest of Site 1 and approximately 320 feet northwest of Site 2.

Volunteers of America – 543 Crocker Street

This receptor also consists of homeless support uses that may be sensitive to noise. It is located approximately 30 feet north of Site 1 and approximately 310 feet north of Site 2.

Weingart Center Association – 566 S. San Pedro Street

This receptor contains housing elements that would be considered sensitive to noise. It is located approximately 10 feet south of Site 1 and 80 feet north of Site 2.

The Midnight Mission – 601 S. San Pedro Street

This receptor also contains housing elements that would be considered sensitive to noise. It is located approximately 215 feet southwest of Site 1 and approximately 100 feet west of Site 2.

Abbey Apartments – 625 S. San Pedro Street

This residential land use is located approximately 400 feet southwest of Site 1 and approximately 85 feet west of Site 2.

Hotel Norbo – 526 E. 6th Street

This residential land use is located approximately 190 feet south of Site 1 and approximately 30 feet east of Site 2.

Central City Community Church – 419 E. 6th Street

This church is located approximately 85 feet west of Site 1 and approximately 130 feet northwest of Site 2.

To help determine these receptors' ambient noise conditions, DKA Planning took a noise measurement at a representative location near the Project along Wall Street.¹³⁴ A daytime ambient noise level of 68.0 dBA L_{eq} was measured, and field observations confirmed that this noise level is reasonably representative for the Project's receptors.¹³⁵ At the time of the noise measurement, vehicle traffic was comparable along north-south streets near 7th Street in the vicinity of the Project Sites. Land uses along these roadways are also fairly consistent. Most noise in the area of the Project Sites is due to vehicle traffic.

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

Less Than Significant With Mitigation Incorporated.

Construction Noise

Noise from demolition and grading activities is typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment.

As noted above, consistent with the Thresholds Guide, the Project would result in a significant impact if construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at such a use. Construction activities would not occur between 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at all on Sunday or during a national holiday.

For this Project, construction noise impacts were modeled using the noise reference levels of excavators and front-end loaders utilized to demolish, excavate, and grade for the Project. Excavators can produce

¹³⁴ The noise measurement was taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurement, and set at approximately 5 feet above the ground.

¹³⁵ It should be noted that recording ambient noise levels at each receptor location is infeasible due to the present conditions of the area of the Project Sites. However, the ambient noise level measured near the Project Sites' area along Wall Street was determined to be reasonably representative of the area.

average peak noise levels of 80.7 dBA at a reference distance of 50 feet; front-end loaders, 79.1 dBA.¹³⁶ Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and debris, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, the simultaneous use of excavators and front-end loaders typically has the greatest potential to cause sustained and significant noise impacts at nearby receptors. The estimated noise levels from the proposed uses of excavators and front-end loaders are shown on Table 6-41. When modeling the noise levels shown below, the impact analysis assumed the simultaneous operation of excavators and front-end loaders on both Project Sites, as it is possible that Site 1 and Site 2 demolition and grading phase activities (respectively) could be concurrent.

**Table 6-41
Construction Noise Levels Without Mitigation**

Receptor	Distance (ft.) Site 1/Site 2	Construction Noise Level (dBA L _{eq})	Existing Ambient (dBA L _{eq})	New Ambient (dBA L _{eq})	Increase
Residential/Transitional Housing/Shelter					
Charles Cobb Apartments	260/560	65.5	68.0	69.9	1.9
Union Rescue Mission	105/320	73.0	68.0	74.2	6.2
Volunteers of America	30/310	79.0	68.0	79.3	11.3
Weingart Center Association	10/80	80.4	68.0	80.7	12.7
The Midnight Mission	215/100	73.0	68.0	74.4	6.4
Abbey Apartments	400/85	74.4	68.0	75.3	7.3
Hotel Norbo	190/30	79.1	68.0	79.4	11.4
Church					
Central City Community Church	85/130	75.9	68.0	76.6	8.6

Source: DKA Planning 2018. Refer to Appendix K.

As shown above, Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community Church could all experience impacts in excess of 5 dBA as a result of the Project's demolition and grading construction activities. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the Thresholds Guide for construction activities lasting more than ten days in a three month period.

Mitigation Measures NOISE-MM-1 and NOISE-MM-2, described in detail below, would reduce the Project's construction noise impact at Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community

¹³⁶ Reference noise levels obtained from the Federal Highway Administration's Roadway Construction Noise Model.

Church to below the Thresholds Guide's recommended 5 dBA threshold of significance. Applicable mitigation measures would require the use of sound mufflers for equipment and the erection of a sound barrier wall. These mitigation measures would also reduce on-site construction source noise levels to below LAMC Section 112.05's 75 dBA limit at 50 feet for powered construction equipment operating in or within 500 feet of residential zones. Therefore, the Project's construction-related noise impacts would be less than significant.

With regard to off-site construction-related noise impacts, peak noise sources would result from haul truck activity during demolition and grading activities, which would require up to approximately 12 haul trips per workday to export excavated soils and demolished materials from the Project Sites to a regional landfill. Such activity can increase ambient noise levels at roadside sensitive receptors along the designated haul route. A 3 dBA increase in traffic-related noise levels is associated with a doubling of traffic, assuming that travel speeds and fleet mix remain constant. A 5 dBA increase in noise levels would require an approximate tripling of traffic. Though the addition of haul trucks would alter the fleet mix of haul route roadways, this effect can be accounted for by the concept of equivalent vehicles, which equates the noise levels from heavy trucks to an acoustically equivalent number of automobiles. According to Federal Highway Administration (FHWA) Reference Energy Mean Emission Levels (REMELs) for its TNM noise prediction software, one heavy truck traveling at 35 mph produces as much noise as approximately 19 automobiles traveling at the same speed. This relationship can be used to determine whether the addition of Project haul trucks would result in an equivalent doubling or tripling of traffic volumes along nearby roadways, and thus whether or not they would be capable of producing a significant impact at any roadside sensitive receptors. Considering that the Project would generate up to approximately 12 haul trips per workday, and that the noise impact of these haul trips would be acoustically equivalent to approximately 228 automobile trips per work day, the Project would not cause an equivalent doubling or tripling of traffic levels that would be associated with either a 3 dBA or 5 dBA noise increase, respectively. The Project is located in a dense urban environment with high traffic levels. Roadways in the vicinity of the Project experience hundreds of automobile trips per hour, even during off-peak hours of travel. On average, Project haul trucks would not contribute more than 50 equivalent automobile trips per work hour on nearby roadways. As a result, the Project's hauling activities would not substantially increase ambient noise levels at sensitive receptors located along haul route roadways. The Project's off-site construction-related noise impact associated with haul trips would be less than significant.

Operational Noise

On-Site Noise Sources

During operations, the Project would produce noise from both on- and off-site sources. For the reasons discussed below, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and on-site operational noise impacts would be less than significant.

Mechanical Equipment

The Project buildings would include HVAC equipment, which would produce on-site noise. However, regulatory compliance with LAMC Section 112.02, referenced above, would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Compliance with this regulation would prevent the Project from unreasonably increasing noise levels at off-site uses as a result of its mechanical noises. Additionally, HVAC systems are relatively quiet in operation and are not likely to contribute to noticeable increases in noise levels at off-site uses. Further, HVAC units would be rooftop mounted in central clusters, setback from rooftop edges. Other mechanical and utility rooms would be internally located and would not be audible off-site.

Residential Land Uses

Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to different degrees. The City's noise ordinance would provide a means to address nuisances related to intrusive residential noises. It should be noted that voice noise levels generally increase proportionally to background ambient noise levels, but only from approximately 55 dBA to 67 dBA at a reference distance of one meter.¹³⁷ Any such noises from the Project's open community areas would therefore be proportional to existing ambient noise levels and would rapidly attenuate by distance. It is unlikely that conversational noises would be substantially audible, if audible at all, at nearby sensitive receptors. These noise levels would have a nominal effect on ambient noise levels in the vicinity of the Project.

Commercial Land Uses

The ground floor of the Project's Tower 1B would include 2,250 square feet of retail area on Site 1, and Building 2 would include an additional 3,200 square feet of ground floor retail area on Site 2. Most noises from the operation of the Project's commercial uses would be internal and inaudible at off-site receptors, especially given the relatively elevated noise levels in the area of the Project Sites, as the sites are located in a transitional neighborhood with a mix of residential, light manufacturing, warehouse, and commercial uses. The addition of the Project's commercial land uses would be consistent with the noise profile of the existing environment and would not result in a noticeable increase in ambient noise levels near the Project Sites. The Project would not include any outdoor amplified music systems.

Auto-Related Activities

Vehicle parking on Site 1 would be provided by a 32-space subterranean parking garage. Auto-related noises would likely be inaudible, or at least considerably attenuated, at off-site locations as a result of the subterranean aspect of the parking garage. Site 2 would contain 221 vehicle parking spaces in a four-level garage, which would replace an existing 133-space surface parking lot. The net increase of 88 parking spaces would have a marginal effect on surrounding noise levels, as according to the Federal Transit

¹³⁷ USEPA, *Speech Levels in Various Noise Environments*, May 1977.

Administration (FTA) calculations for parking garage noise, a parking garage with an hourly vehicle activity equal to the garage's 221-vehicle capacity would only produce a noise level of approximately 50 dBA L_{eq} .¹³⁸ Considering that the existing ambient noise levels in the area of the Project Sites are typically greater than 60 dBA L_{eq} , any noise increase would be negligible and below thresholds of perceptibility.

Off-Site Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with net new daily trips. On a typical weekday, the Project would generate an estimated 2,038 net new daily trips, including 229 during the AM peak hour and 197 during the PM peak hour.¹³⁹ The noise levels of these vehicle trips were modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels in dBA along roadway segments. For this analysis, the "existing year (2017) no Project" scenario was compared to the "existing year (2017) with Project" scenario, as well as comparison of the "future year (2025) no Project" scenario to the "future year (2025) with Project" scenario. Tables 6-42 through 6-45 show the Project's projected contributions to peak-hour ambient noise level increases along modeled roadway segments. As shown, Project traffic would not result in a noticeable increase in noise levels. The overall effect on 24-hour noise levels would be far below the Thresholds Guide's minimum 3 dBA CNEL noise increase threshold for operational noise sources. Therefore, Project impacts related to traffic noise would be less than significant.

Table 6-42
Estimated AM Peak-Hour Mobile Source Noise Levels (2017)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2017)	With Project (2017)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6 th St.	69.7	69.8	0.1	No
S/B Los Angeles St., N of 6 th St.	67.6	67.7	0.1	No
E/B 6 th St., E of San Pedro St.	63.3	63.3	< 0.1	No
N/B San Pedro St., N of 6 th St.	64.5	64.6	0.1	No
S/B San Pedro St., N of 6 th St.	65.0	65.1	0.1	No

Source: DKA Planning, 2018. Refer to Appendix K.

¹³⁸ FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

¹³⁹ Linscott Law & Greenspan Engineers, *Weingart Projects Traffic Impact Study*, March 2018.

Table 6-43
Estimated PM Peak-Hour Mobile Source Noise Levels (2017)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2017)	With Project (2017)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6 th St.	70.0	70.0	< 0.1	No
S/B Los Angeles St., N of 6 th St.	69.0	69.0	< 0.1	No
E/B 6 th St., E of San Pedro St.	67.2	67.4	0.2	No
N/B San Pedro St., N of 6 th St.	66.4	66.4	< 0.1	No
S/B San Pedro St., N of 6 th St.	65.9	65.9	< 0.1	No

Source: DKA Planning, 2018. Refer to Appendix K.

Table 6-44
Estimated AM Peak-Hour Mobile Source Noise Levels (2025)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2025)	With Project (2025)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6 th St.	71.0	71.0	< 0.1	No
S/B Los Angeles St., N of 6 th St.	69.2	69.2	< 0.1	No
E/B 6 th St., E of San Pedro St.	66.7	67.0	0.3	No
N/B San Pedro St., N of 6 th St.	65.8	65.9	0.1	No
S/B San Pedro St., N of 6 th St.	66.2	66.2	< 0.1	No

Source: DKA Planning, 2018. Refer to Appendix K.

Table 6-45
Estimated PM Peak-Hour Mobile Source Noise Levels (2025)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2025)	With Project (2025)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6 th St.	71.5	71.6	0.1	No
S/B Los Angeles St., N of 6 th St.	70.4	70.4	< 0.1	No
E/B 6 th St., E of San Pedro St.	69.3	69.4	0.1	No
N/B San Pedro St., N of 6 th St.	67.6	67.6	< 0.1	No
S/B San Pedro St., N of 6 th St.	67.1	67.2	0.1	No

Source: DKA Planning, 2018. Refer to Appendix K.

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

Less Than Significant Impact. The information and analysis in this section is based on the noise modeling results prepared by DKA Planning (refer to Appendix K).

Introduction to Vibration

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

This noise analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.¹⁴⁰

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.¹⁴¹ Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal Transit Administration

For the evaluation of construction-related vibration impacts, state standards set by the FTA are used given the absence of federal, county, and city standards specific to construction activities. In 2006, the FTA published the Transit Noise and Vibration Impact Assessment manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table 6-46 summarizes the FTA's vibration guidelines for building and structural damage.

¹⁴⁰ California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, September 2013.

¹⁴¹ *Ibid.*

Table 6-46
FTA Vibration Damage Potential Threshold Criteria

Building Category	Construction Damage Vibration Criteria (PPV, in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
<i>Source: FTA, 2006.</i>	

Project Impacts

Construction Vibration

As discussed earlier, construction of the Project would require heavy-duty earthmoving vehicles such as excavators and front-end loaders. These types of vehicles can produce peak vibration velocities of up to 0.089 inches per second PPV at a distance of 25 feet.¹⁴² Auger drilling rigs for shoring activities can produce similar vibration levels. Table 6-47 shows the Project's estimated construction vibration levels at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration from the Project's construction activities. Other buildings are located at greater distances from the Project and would experience reduced vibrations. Therefore, the Project's construction-related vibration impacts would be less than significant.

Operational Vibration

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would be less than significant.

¹⁴² *Ibid.*

**Table 6-47
Potential Building Damage Vibration Levels At Off-Site Structures – Unmitigated**

Building/Structure	Distance from Project Sites (ft.)	Condition	Significance Threshold PPV (in/sec)	Impact PPV (in/sec)	Significant?
Volunteers of America 543 Crocker St.	30	Engineered concrete and masonry (no plaster)	0.3	0.073	No
Weingart Center Association 556 S. San Pedro St.	10	Engineered concrete and masonry (no plaster)	0.3	0.244	No
Hotel Norbo 526 E. 6 th St.	30 ¹	Engineered concrete and masonry (no plaster)	0.3	0.073	No
Weingart Association Center Corporate Offices 522 E. 6 th St.	10	Engineered concrete and masonry (no plaster)	0.3	0.244	No
¹ A portion of Site 2 is located approximately 10 feet from this receptor. However, there would be no major building construction at this site location. A courtyard is proposed for the eastern portion of Site 2 nearest to Hotel Norbo. Construction of this courtyard would not require the use of any significant vibration-generating equipment. Source: DKA Planning 2018. Refer to Appendix K.					

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

Less Than Significant Impact. As discussed in response to Checklist Question 12(a), operation of the Project would not generate a substantial permanent increase in noise in excess of City noise standards. Therefore, Project impacts related to permanent noise increase would be less than significant.

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question 12(a), without mitigation, the Project's construction activities could generate noise in excess of the Thresholds Guide's 5 dBA construction noise impact threshold. However, implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2, as described below, would reduce the construction noise levels to below these thresholds (refer to Table 6-45). Thus, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in excess of the relevant noise standards. Therefore, Project impacts related to temporary or periodic noise increase would be less than significant.

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

No Impact. The Project Sites are not located within an airport land use plan or within two miles of a public airport or public use airport. The closest airport to the Project Sites is the Hollywood Burbank

Airport located approximately 15.4 miles northwest of the site. Based on the above the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

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

No Impact. The Project Sites are not located in the vicinity of a private airstrip. Thus, the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels.

Mitigation Measures (Construction Noise)

Implementation of the following mitigation measures would ensure that the Project's construction-related noise impacts would be less than significant:

NOISE-MM-1: All diesel-powered construction vehicles shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOISE-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's boundaries.

As shown on Table 6-48, the implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce the Project's construction-related ambient noise level increases at Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community Church to below the L.A. CEQA Thresholds Guide's 5 dBA threshold of significance. With regard to Mitigation Measure NOISE-MM-1, exhaust mufflers and engine compartment damping systems would reduce the maximum noise levels of powered construction equipment by at least 3 dBA, conservatively. Regarding Mitigation Measure NOISE-MM-2, temporary noise barriers with a transmission loss value of at least 20 dBA would be capable of reducing construction noise levels by at least 10 dBA. Barriers constructed of 22-gage steel or 0.0625-inch-thick aluminum sheeting could achieve this standard. One-half-inch plywood barriers also would be acceptable. With these measures in place, the Project's construction noise impact would be less than significant.

**Table 6-48
Construction Noise Levels With Mitigation**

Receptor	Distance (ft.) Site 1/Site 2	Construction Noise Level (dBA L _{eq})	Existing Ambient (dBA L _{eq})	New Ambient (dBA L _{eq})	Increase
Residential/Transitional Housing/Shelter					
Charles Cobb Apartments	260/560	52.5	68.0	68.1	0.1
Union Rescue Mission	105/320	60.0	68.0	68.6	0.6
Volunteers of America	30/310	66.0	68.0	70.1	2.1
Weingart Center Association	10/80	67.4	68.0	70.7	2.7
The Midnight Mission	215/100	60.3	38.0	68.7	0.7
Abbey Apartments	400/85	61.4	68.0	68.9	0.9
Hotel Norbo	190/30	66.1	68.0	70.2	2.2
Church					
Central City Community Church	85/130	62.9	68.0	69.2	1.2
<i>Source: DKA Planning 2018. Refer to Appendix K.</i>					

Cumulative Impacts

Construction Noise

As discussed previously, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. The related projects closest to the Project Sites include the following (refer to Figure 2-8 in Section 2 [Project Description]):

#63, located at 649 South Wall Street, approximately 881 feet southwest of Site 2, includes development of a 66,000-square-foot medical office and assisted living facility

#89, located at 656 South Stanford Avenue, approximately 858 feet southeast of Site 2, includes development of 82 dwelling units

#151, located at 655 South San Pedro/513 East 7th Street, approximately 230 feet southwest of Site 2, includes development of 84 dwelling units

#159, located at 609 East 5th Street, approximately 747 feet northeast of Site 1, includes development of 151 dwelling units.

As shown, only one related project (#151) is located within 500 feet of the Project, the screening distance recommended by the Thresholds Guide to identify potential construction impacts. This related project, a

modest residential development located at 655 South San Pedro Street/513 East 7th Street, is approximately 230 feet southwest of the Site 2. This related project is located approximately 160 feet southwest of Abbey Apartments and 275 feet southwest of The Midnight Mission. The Project Sites are located 85 feet east and 100 feet east of these receptors, respectively. With mitigation, the Project's construction noise impact at Abbey Apartments would be only 0.9 dBA. At The Midnight Mission, its noise impact would be just 0.6 dBA. Given the related project's extra distance from these two sensitive receptors, it stands to reason that construction of the related project would result in noise impacts that are less than the Project's own impacts, assuming that the related project incorporates a similar set of project design features or mitigation measures that represent industry "best practices" for controlling the construction noise of urban infill projects in compliance with the City's noise regulations. Combined, simultaneous construction noises from both projects would not increase ambient noise levels at Abbey Apartments and The Midnight Mission by greater than 5 dBA. With the identified mitigation, the Project would have a minimal and less than significant impact at these receptors, and its potential to contribute to cumulative construction noise levels at these receptors would be less than significant.

Operational Noise

The majority of the Project's long-term noise would come from traffic traveling to and from the Project Sites. This addition of future traffic from any new developments in the vicinity of the Project Sites and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's individual contribution to permanent off-site ambient noise level increases would be minimal. As shown on Tables 6-44 and 6-45, with or without the addition of Project traffic, future roadside ambient noise levels would not increase by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Therefore, the Project's cumulative operational noise impact would be less than significant.

13. POPULATION AND HOUSING

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

Less Than Significant Impact. A significant impact could occur if the Project would locate new development such as homes, businesses, and/or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the L.A. CEQA Thresholds Guide the determination of whether a project results in a significant impact on population and housing growth considers (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy, and would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the Project.

Existing Conditions

The Project Sites are located within SCAG’s jurisdiction. SCAG’s mandated responsibilities include development plans and policies with respect to the region’s population growth, transportation programs, air quality, housing, and economic development. The 2016–2040 RTP/SCS includes the following proposed growth forecast for population, households, and employment for the City 2040.¹⁴³

- Population: 3,845,500 persons in 2012 and 4,609,400 in 2040;
- Households: 1,325,500 households in 2012 and 1,690,300 in 2040; and
- Employment: 1,696,400 jobs in 2012 and 2,169,100 in 2040.

According to analysis by the State’s Housing and Community Development Department, prior to the recent economic downturn and foreclosure crisis, California had experienced decades of undersupply of housing, contributing to significant price escalation and the affordability crisis.¹⁴⁴ The factors contributing to California’s continuing housing supply and affordability problems include a chronic mismatch between the existing housing stock and the demand for housing by type and location; lack of sufficient housing construction to meet demand; and persistently high housing costs relative to household incomes, even with the effects of the recent national recession.

Almost all future California population and household growth will occur in metropolitan areas, and most of that will occur in southern California. According to SCAG’s 2008 growth forecast, the six-county region is projected to add about 4.6 million people and about 1.6 million households between 2010 and 2035. In Los Angeles County (County) alone, the forecast envisions about 1.7 million people and about 646,000 households between 2010 and 2035. As the largest city in the County, the City will receive most of the County’s future growth.

Table 6-49 lists SCAG’s forecasts for population, housing employment, and persons-per-household rate for the City, as well as the number and percent change.¹⁴⁵

¹⁴³ SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24: http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf.

¹⁴⁴ State of California – Business, Transportation and Housing Agency, *The State of Housing in California 2012: Affordability Worsens, Supply Problems Remain*, 2012.

¹⁴⁵ Employment information is provided for informational purposes only.

Table 6-49
Population, Housing, Employment,
and Persons-Per-Household Forecasts for the City

Year	Population	Households	Employment¹	Person/Households
2017 ²	3,981,910	1,390,645	1,780,810	2.86
2020 ³	3,991,700	1,455,700	1,817,700	2.74
2025 ²	4,200,166	1,494,844	1,915,866	2.81
2035 ³	4,320,600	1,626,600	1,906,800	2.66
2040 ⁴	4,609,400	1,690,300	2,169,100	2.72
Change 2017 to 2025⁵				
Number Changed	+218,256	+104,232	+135,056	-0.05
Percent Changed	+5.48%	+7.50%	+7.58%	-1.87%
Change 2020 to 2035				
Number Changed	+328,900	+170,900	+89,100	-0.08
Percent Changed	+8.2%	+11.7%	+4.9%	-2.9%
Change 2020 to 2040				
Number Changed	+617,700	+234,900	+351,400	-0.02
Percent Changed	+15.4%	+16.1%	+19.3%	0.72%
¹ Employment information is provided for informational purposes only.				
² Population, housing and employment rate data for years 2017 (baseline year) and 2025 (anticipated buildout year of the Project) were calculated based on a linear interpolation of the 2012 to 2040 projections in SCAG's adopted 2016-2040 RTP/SCS.				
³ 2020 and 2035: Based on SCAG's adopted 2012-2035 RTP/SCS, page 32.				
⁴ 2040: Based on SCAG's adopted 2016-2040 RTP/SCS, Appendix, page 24.				
⁵ Represents a comparison of baseline year to Project buildout year.				

Existing Uses

The Project Sites are located in Downtown Los Angeles, a highly urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. According to the Project Applicant, approximately 15 people are employed at Site 1.

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless the work requirements of most construction activities are highly specialized, so that

construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the development of up to 685 new residential dwelling units, including approximately 451 permanent supportive units, up to 225 affordable housing units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.¹⁴⁶ Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.¹⁴⁷ It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

Population: As shown on Table 6-50, compared to the anticipated population growth in the City between the 2017 baseline year and the Project's anticipated buildout year of the 2025, the Project's residential population would represent 0.24 percent of the total forecasted City population growth during that period. The Project's residential population would represent 0.16 percent of the forecasted growth between 2020 and 2035 in the City and 0.08 percent of the forecasted population growth between 2020 and 2040.

¹⁴⁶ *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

¹⁴⁷ *1,420 maximum residents/685 units = 2.07 persons per unit.*

**Table 6-50
Project Growth Comparison to Growth Forecasts**

Net Project Population, Housing, and Employment Growth	Forecast Citywide Growth¹	Project % of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2017 to 2025 (Interpolated)		
533 residents	+218,256	0.24
685 units	+104,232	0.66
74 employees	+135,056	0.06
As compared to SCAG Growth Forecast from 2020 to 2035¹		
533 residents	+328,900	0.16
685 units	+170,900	0.40
74 employees	+89,100	0.08
As compared to SCAG Growth Forecast from 2020 to 2040		
533 residents	+617,700	0.08
685 units	+234,900	0.29
74 employees	+351,400	0.02
¹ Refer to Table 6-49.		

Housing: As shown on Table 6-50, compared to the anticipated housing growth in the City between the 2017 baseline year and the Project’s anticipated buildout year of the 2025, the Project’s residential housing would represent 0.66 percent of the forecasted City housing growth. The Project’s housing units would represent approximately 0.40 percent of forecasted growth between 2020 and 2035 in the City and 0.29 percent between 2020 and 2040.

Employment: As shown on Table 6-50, compared to the anticipated employment growth in the City between the 2017 baseline year and the Project’s anticipated buildout year of the 2025, the Project’s employment would represent 0.06 percent of the forecasted City employment growth. The Project’s employment would represent approximately 0.08 percent of forecasted growth between 2020 and 2035 in the City and 0.02 percent between 2020 and 2040.

The Project Sites are located in the “Skid Row” area of Downtown Los Angeles that is defined as the area east of Main Street, south of 3rd Street, west of Alameda Street, and north of 7th Street, and contains a large population of homeless people. According to the 2017 Greater Los Angeles Homeless Count, there are approximately 7,386 homeless persons living within Council District 14 (the Council District in which the Project Sites are located), with approximately 57 percent living unsheltered.¹⁴⁸ The purpose of the

¹⁴⁸ 2017 Greater Los Angeles Homeless Count, Los Angeles Homeless Services Authority, 2018. <https://www.lahsa.org/homeless-count/>, access on April 28, 2018

Project is to provide permanent supportive and affordable housing and services to help meet the needs of an existing homeless population.

Approximately 66 percent of the housing provided as part of the Project would be restricted to house only persons who were previously homeless, representing approximately 937 people.¹⁴⁹ The remaining 483 future Project residents would occupy affordable housing units and could comprise individuals and families and in each case, could also be previously homeless people, as well.¹⁵⁰ As stated previously, approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City, equating to approximately 887 people. Given the number of homeless people living in the City (including the relatively large homeless population living near the Project Sites), it is anticipated that some or all of the 937 Project (previously-homeless) residents already live in the City and as such, it is likely that as much as 66 percent of the Project's population growth (up to 937 people) would not represent new growth in the City. Of course, it is also possible that the remaining Project residents already live in the City, as well. Assuming this, none of the Project's population growth would represent new growth in the City. However, for a conservative analysis, the comparison of the Project's potential growth as compared to growth forecasts for the City presented on Table 6-50 assumes that all of the Project's residents would be relocated to the City. As shown on the table, the Project's population, housing, and employment growth falls within SCAG's growth projections for the City.

Additionally, the Project Sites are already served by an existing roadway network and utility and public services infrastructure. The Project does not include the development of any new or extended roadways or other infrastructure. For the reasons discussed above, the Project would not indirectly or directly induce substantial population growth. Therefore, Project impacts related to population growth would be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing currently exists on the Project Sites. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. The Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere. The Project would provide up to 685 new dwelling units to accommodate an existing homeless population. Thus, no impact would occur.

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

No Impact. No housing currently exists on the Project Sites, and no people live on the Project Sites. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface

¹⁴⁹ As stated previously, the Project would have a maximum occupancy of 1,420 people. $1,420 \text{ people} \times 66\% = 937 \text{ people}$.

¹⁵⁰ $1,420 \text{ people} - 937 \text{ people} = 483 \text{ people}$.

parking lot. The Project Sites are not currently used as housing by the homeless population and thus, construction of the Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere. The Project would provide 685 new dwelling units to accommodate an existing homeless population. Thus, no impact would occur.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) include development of approximately 114,595 dwelling units. It is possible that some of the sites of these related projects already include residential land uses that would be removed with implementation of the related projects and as such, the total net number of dwelling units that would be created would be fewer than what has been estimated, and it is likely, as a result of natural growth, that many of the units will be occupied by people already residing in the City. Much of the growth in the City is targeted in transit-rich areas such as Downtown Los Angeles. The related project list includes applications and plans under consideration and some or all may not be constructed or may be constructed at lower unit counts than shown. In addition, the City is currently experiencing a strong market environment, and it is anticipated that growth will even out over time. Thus, cumulative growth is assessed over the 2020-2040 year time frame established in the SCAG housing growth forecast. However, for a conservative analysis, it is assumed that all estimated dwelling units would be net new units and all residents would be net new residents. The housing units associated with the related project would generate approximately 278,466 cumulative residents.¹⁵¹

As shown on Table 6-51, cumulative residential population would represent approximately 45.16 percent of the population growth forecast between 2020 and 2040 for the City, and cumulative housing units would represent approximately 49.08 of the housing growth forecast between 2020 and 2040 for the City. As stated previously, approximately 66 percent of the housing provided as part of the Project would be restricted to supportive housing, designed to house only persons who were previously homeless, representing approximately 937 people. (The remaining Project residents would occupy affordable units and could also be previously homeless people.) Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City, equating to approximately 887 people. Given the number of homeless people living in the City (including the relatively large homeless population living near the Project Sites), it is anticipated that some or all of the 937 Project (previously-homeless) residents already live in the City and as such, it is likely that as much as 66 percent of the Project's population growth (approximately 937 people) would not represent new growth in the City. Of course, it is also possible that the remaining approximately 483 future Project residents already live in the City, as well. Assuming this, none of the Project's population growth would represent new growth in the City. However, for a conservative analysis, the comparison of the Project's potential growth as compared to growth forecasts for the City presented on Table 6-48 assumes that all of the Project's residents would relocate to the City. As shown on the table, the Project's population, housing, and employment growth falls within SCAG's growth projections for the City. Thus, the Project would not directly contribute to cumulative population growth. Therefore, the Project's contribution to cumulative population growth in the City would not be considerable.

¹⁵¹ *The number of cumulative residents is based on the American Community Survey, 5-year (2013-2016) Average Estimates rate of 2.43 persons per household for the City.*

**Table 6-51
Cumulative Comparison to Growth Forecasts (2020-2040)**

Cumulative Population and Housing Growth	Forecast Citywide Growth¹	Cumulative % of Forecast Citywide Growth
278,999 residents	+617,700	45.16
115,280 units	+234,900	49.08
¹ Refer to Table 6-49.		
² This conservatively assumes that all of the cumulative projects would have the same buildout year as the Project.		

14. PUBLIC SERVICES

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

(i) Fire protection?

Less Than Significant Impact. The LAFD provides fire and emergency medical protection services to the Project Sites. The Project Sites are located in an urbanized area of the City that is currently served by existing LAFD services. Fire stations that serve the Project Sites are shown on Table 6-52.

**Table 6-52
Fire Stations Serving the Project Sites**

No.	Address	Distance from Project Sites (miles)
9	430 7 th Street	0.2
4	450 East Temple Street	1.3
10	1335 South Olive Street	1.6
<i>Source: LAFD, https://www.lafd.org/fire-stations/station-results, access August 1, 2018.</i>		

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

To comply with California Department of Industrial Relations (Cal-OSHA) and state and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.¹⁵² Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and state regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General “good housekeeping” procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Staging and Traffic Management Plan (CSTMP) (refer to Mitigation Measure TRAFFIC-MM-1), which includes traffic management strategies for Project construction. The CSTMP would outline and dictate how construction operations would be carried out, and would identify specific actions to reduce effects on the surrounding community. The CSTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity.

In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. While even with the CSTMP, it is acknowledged that the Project would incrementally increase traffic, which could potentially delay emergency response times, the Project's potential impacts are minimal given these other factors.

¹⁵² <https://www.dir.ca.gov/title8/1920.html>

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. Therefore, impacts associated with construction of the Project would be less than significant.

Operation

As stated previously, the Project would increase the amount of developed square footage on the Project Sites, which in turn, would generate new residents, visitors, and employees at the Project Sites, and could increase the need for fire protection services at the sites. It should be noted that the purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.¹⁵³ Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.¹⁵⁴ It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

The paragraphs below discuss the criteria for determining the Project's impacts to fire protection services, including fire flow and response distance.

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (plan check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Sites would be adequate, and the associated impact would be less than significant.

¹⁵³ *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

¹⁵⁴ *1,420 maximum residents/685 units = 2.07 persons per unit.*

Response Distance

The nearest fire station with an engine and truck company is Station No. 9, approximately 0.2 miles from the Project Sites. Additional fire stations within 2.0 miles include Station Nos. 4 and 10. LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route. If the response distance standard cannot be achieved for a specific location, then fire sprinkler systems are required. Nonetheless, a fire sprinkler system would be included in the mixed-use buildings for all proposed land uses as part of the Project. Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, appropriately-sized exterior graphics, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the close proximity of the closest fire station with an engine and the fire protection systems that would be incorporated into the proposed building, Project impacts related to response distance and time would be less than significant.

Emergency Access

The LAFD would review the Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. The Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Cumulative Impacts

Implementation of the related projects on Table 2-2 in Section 2 (Project Description) could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and

related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

(ii) Police protection?

Less Than Significant With Mitigation Incorporated. The LAPD provides police protection services to the Project Sites. As discussed above, the Project would increase the number of residents and employees at the Project Sites. Implementation of the Project could result in an increase in calls for police protection.

A significant impact may occur if the LAPD could not adequately serve a project, necessitating a new or physically altered station. The determination of whether a project could result in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Sites as needed and appropriate during the construction process. This security includes perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Sites during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

- (1) Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAPD;
- (2) Construction impacts are temporary in nature and do not cause lasting effects; and
- (3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the

Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The maximum residential occupancy for the Project would be 1,420 individuals, subject to the requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.¹⁵⁵ Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.¹⁵⁶ It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

Additionally, the Project would include project design features, namely include security features within the parking facilities and exterior building areas such as appropriate lighting and gated access. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility and the Project would provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. The Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. The Project would feature the following:

- On-site security personnel;
- Security cameras;
- Perimeter lighting to supplement the street lighting and to provide increased visibility and security;

¹⁵⁵ *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

¹⁵⁶ *1,420 maximum residents/685 units = 2.07 persons per unit.*

- Parking structure access control; and
- Residential units access control.

As outlined in Mitigation Measure POLICE-MM-1, the Project would provide the LAPD with a diagram of each portion of the Project Sites, showing access routes and additional access information as requested by the LAPD, to facilitate police response. Emergency access to the Project Sites would be provided by the existing street system. The Project's direct minimal population increase and associated demand for police services, along with the provision of on-site security features, coordination with LAFD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Therefore, with mitigation, Project impacts related to police protection services would be less than significant.

Mitigation Measure (Public Services – Police Services)

POLICE-MM-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall provide the Central Area Commanding Area Officer with diagrams of each portion of the Project Sites. The diagrams shall include access routes and additional information that might facilitate police response.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could result in a net increase in the number of residents and employees in the area of the Project Sites and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

(iii) Schools?

Less Than Significant Impact. Los Angeles Unified School District (LAUSD) provided a list of LAUSD schools that serve the Project Sites and area are shown on Table 6-53. As shown on Table 6-54, the Project would generate a total of approximately 311 students, including 1555 elementary students, 42 middle school students, and 114 high school students. The elementary and middle schools and the Belmont High School Zone serving the Project Sites are currently operating over capacity, whereas the Jefferson High School Zone serving the Project Sites is operating under capacity. However, pursuant to

the California Government Code Section 65995, the Project's required payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Table 6-53
LAUSD School's Serving the Area of the Project Sites
Student Capacity and Enrollment

School Type (Grade)	School Name	Location	Capacity (students)	Actual Enrollment (students)	(-)Under / (+)Over Capacity (students)
Elementary School	9 th Street Elementary School	835 Stanford Avenue	360	342	+73
Middle School	Hollenbeck Middle School	2510 East 6 th Street	1,453	1,073	+83
High School	Belmont High School Zone	Various	7,041	5,331	+109
High School	Jefferson High School Zone	Various	5,706	4,466	-2,195

Source: LAUSD, Rena Perez, Director, November 16, 2017 (refer to Appendix L).

Table 6-54
Estimated Project Student Generation

Land Use	Size	School Type	Student Generation Rate ¹	Total Students Generated ²
Residential	685 du	Elementary (K-6)	0.2269/du	155
		Middle (7-8)	0.0611/du	42
		High (9-12)	0.1296/du	114
Total				311

du = dwelling unit
¹ *Los Angeles Unified School District, Student Generation Rate Calculation, Table 3, March 2017.*
According to the 2017 Greater Los Angeles Homeless Count, approximately 6.0 percent of the homeless population in Council District 14 (the Council District in which the Project Sites are located) is school-aged children. As such, the total number of students estimated for the Project is conservative.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) could result in an increase in the number students in the Project area. However, similar to the applicant of the proposed Project, the applicants of all the related projects would be required to pay the applicable school fees to the LAUSD to

ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

(iv) Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the area of the Project Sites. Parks and recreational facilities that serve the Project Sites and area are shown on Table 6-55.

**Table 6-55
Parks and Recreation Facilities**

Park/Recreation Facility Name	Address
Neighborhood Parks within 2.0-mile radius	
6 th and Gladys Street Park	824 E 6 th Street
Arts District Park	501 S Hewitt Street
Grand Hope Park	900 S. Hope Street
Hope and Peace Park	843 Bonnie Brae Street
Orthopedic Hospital Universal Access Playground	2400 S. Flower Street
Patton Street Pocket Park	317-327 Patton Street
Prospect Park	612 N. Echandia Street
Rockwood Community Park	1571 Rockwood Street
San Julian Park	312 E. 5th Street
Spring Street Park	428 S. Spring Street
Unidad Park	1644-48 Beverly Boulevard
Community Parks within 5.0-mile radius	
Aliso-Pico Recreation Center	370 S. Clarence Street
Alpine Recreation Center	817 Yale Street
Augustus F. Hawkins Natural Park	5790 Compton Avenue
Bellevue Recreation Center	826 Lucille Avenue
Boyle Heights Sports Center	933 S. Mott Street
Carlin G. Smith Recreation Center	511 W. Avenue 46
Central Recreation Center	1357 E. 22nd Street
Cypress Recreation Center	2630 Pepper Avenue
Denker Recreation Center	1550 W. 35th Place
Downey Pool	1775 N. Spring Street
Downey Recreation Center	1772 N. Spring Street
Echo Park	751 Echo Park Boulevard
Echo Park Boys and Girls	303 Patton Street
Echo Park Deep Pool	1419 Colton Street
El Sereno Recreation Center	4721 Klamath Street
El Sereno Senior Citizens Center	4818 Klamath Place
Elysian Valley Recreation Center	1811 Ripple Street
Evergreen Recreation Center	2839 E. 4th Street
EXPO Center	3980 S. Menlo Avenue
Fred Roberts Recreation Center	4700 Honduras Street
Gilbert W. Lindsay Community Center	429 E. 42nd Place
Hazard Park	2230 Norfolk Street
Hollenbeck Park	415 S. St. Louis Street
Hostetter Park	3141 E. Olympic Boulevard
James Slauson Recreation Center	5306 S. Compton Avenue

**Table 6-55
Parks and Recreation Facilities**

Park/Recreation Facility Name	Address
Lafayette Park	2830 W. 6th Street
Lake Street Park	227 N. Lake Street
Lemon Grove Recreation Center	4959 Lemon Grove Avenue
Lincoln Heights Recreation Center	2303 Workman Avenue
Lincoln Heights Youth Center	2500 Griffin Avenue.
Lincoln Park	3501 Valley Boulevard
Loren Miller Recreation Center	2717 Halldale Avenue
MacArthur Park	2230 W. 6th Street
Martin Luther King Jr. Park	3934 S. Western Avenue
Miguel Contreras Learning Center Pool	322 S. Lucas Avenue
Montecito Heights Recreation Center	4545 Homer Street
Msgr. Ramon D. Garcia Recreation Center	1016 S. Fresno Avenue
Normandie Recreation Center	1550 S. Normandie Avenue
Parkview Photo Center,	2332 W. 4th Street
Pecan Recreation Center	127 S. Pecan Street
Pershing Square	525 S. Olive Street
Pueblo del Rio Recreation Center	5350 Alba Street
Queen Anne Recreation Center	1240 West Boulevard
Ramona Gardens Park	2830 Lancaster Avenue
Ramona Gardens Recreation Center	2830 Lancaster Avenue
Ramona Hall Community Center	4580 N. Figueroa Street
Rio de Los Angeles State Park	1900 N. San Fernando Road
Roosevelt High School Pool	456 S. Mathews Street
Rose Hill Park	3606 Boundary Avenue
Rose Hill Recreation Center	4530 Mercury Avenue
Seoul International Park	3250 San Marino Street
Shatto Recreation Center	3191 W. 4th Street
Silverlake Recreation Center and Dog Park	1850 W. Silverlake Boulevard
South Los Angeles Sports Activity Center	7020 S. Figueroa Street
South Park Recreation Center	345 E. 51st Street
South Seas House Park	2301 W. 24th Street
State Street Recreation Center	716 N. State Street
Sycamore Grove Park	4702 N. Figueroa Street
Toberman Recreation Center	1725 Toberman Street
Trinity Recreation Center	2415 Trinity Street
Vista Hermosa Soccer Field	1301 W. 1st Street
Wabash Recreation Center	2765 Wabash Avenue
Regional Parks within 10.0-mile radius	
Arroyo Seco Park	5568 Via Marisol
Ascot Hills Park	4371 Multnomah Street
Barnsdall Park	4800 Hollywood Boulevard
Cahuenga Peak Phase I	3698 W. Wonderview Road (in Griffith Park)
Cahuenga Peak Phase II	3698 W. Wonderview Road (in Griffith Park)
Campo de Cahuenga	3919 Lankershim Boulevard
Charles F. Lummis Home	200 E. Avenue 43
Cheviot Hills Park	2551 Motor Avenue
Elysian Park	929 Academy Road
Ernest E. Debs Regional Park	4235 Monterey Road
Exposition Park Rose Garden	701 State Drive

**Table 6-55
Parks and Recreation Facilities**

Park/Recreation Facility Name	Address
Griffith Park	4730 Crystal Springs Drive
Griffith Park Boys Camp	4730 Crystal Springs Drive (in Griffith Park)
Harding Golf Course	4730 Crystal Springs Drive (in Griffith Park)
Heritage Square	3800 Homer Street
Hollywoodland Girl's Camp	3200 Canyon Drive (in Griffith Park)
L.A. Equestrian Center	500 Riverside Drive (in Griffith Park)
L.A. Live Steamers	5202 Zoo Drive (in Griffith Park)
Los Feliz Golf Course	3207 Los Feliz Boulevard
Rancho Park Golf Course	10460 Pica Boulevard
Roosevelt Golf Course	2650 N. Vermont Avenue (in Griffith Park)
Runyon Canyon Park	2000 N. Fuller Avenue
Rustic Canyon Park	SW of Sullivan Fire Road
South L.A. Wetlands Park	5413 S. Avalon Boulevard
Travel Town Museum	Griffith Park Drive near Zoo Drive (in Griffith Park)
Wattles Garden Park	1824 N. Curson Avenue
White Point Park Nature Preserve	1600 S. Paseo del Mar
Wilson Golf Course	4730 Crystal Springs Drive (in Griffith Park)
¹ <i>Written correspondence from Darryl Ford, Senior Management Analyst I, Los Angeles Department of Recreation and Parks, November 17, 2016. Refer to Appendix L.</i>	

A breakdown of common open space components for Site 1 and 2 are shown on Tables 6-56 and 6-57, respectively. All of the Project's proposed 685 dwelling units would have fewer than three habitable rooms, for which LAMC Section 12.21 G requires 100 square feet of open space per dwelling unit. Based on this standard, the Project would be required to provide 59,500 square feet of open space. Pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), the Project Applicant is requesting approval to reduce the required open space square footage on Site 1 by 33 percent. For Site 2, the Project Applicant is requesting an incentive to permit 27 percent (9,145 square feet) of the common open space be provided in interior common areas and 30 percent (or 10,040 square feet) of the provided open space to be covered by a structure or trellis in lieu of the requirements of LAMC Section 12.21 G that limits the interior common areas to 25 percent of required (or 7,574 square feet) and mandates all exterior areas to be open to the sky.

To encourage the development of affordable housing, the City's Greater Downtown Housing Incentive Area Ordinance allows for a 50 percent reduction of open space – a reduction that is larger reduction than the reductions requested by the Project Applicant. Even with the requested reductions, the Project would provide 59,060 square feet of open space, specifically tailored to formerly homeless individuals. The open spaces would include exterior and interior areas, providing passive enjoyment as well as allowing for an extensive array for social services for each resident. A portion of the open space areas is exterior spaces covered by building structure or trellis/solar arrays. Technically, these areas would not count toward the Project's LAMC-required open space requirements, but they would be an important amenity to high-density affordable housing.

**Table 6-56
Common Open Space Components for Site 1 Development**

Common Open Space Component	Size
<i>Tower 1A</i>	
<i>Exterior Open Space (Open to Sky)</i>	
Level 1 Courtyard	1,800 sf
Level 3 Garden Court	<u>1,290 sf</u>
<i>Subtotal</i>	<i>3,090 sf</i>
<i>Exterior Open Space (Not Open to Sky)</i>	
Level 3	445 sf
Levels 6 & 7	1,400 sf
Level 12	700 sf
Level 13	850 sf
Level 18	<u>3,910 sf</u>
<i>Subtotal</i>	<i>7,305 sf</i>
<i>Interior Recreation Room</i>	
Level 1	4,395 sf
Level 3	<u>5,405 sf</u>
<i>Subtotal</i>	<i>9,800 sf</i>
<i>Total Tower 1A</i>	<i>20,195 sf</i>
<i>Tower 1B</i>	
<i>Exterior Open Space (Open to Sky)</i>	
Level 1 Courtyard	2,260 sf
Level 12 Open Deck	<u>1,120 sf</u>
<i>Subtotal</i>	<i>3,380 sf</i>
<i>Interior Recreation Room</i>	
Level 1	1,415 sf
Level 12	<u>1,070 sf</u>
<i>Subtotal</i>	<i>2,485 sf</i>
<i>Total Tower 1B</i>	<i>5,865 sf</i>
Total	26,060 sf
<i>sf = square feet</i>	

**Table 6-57
Common Open Space Components for Site 2 Development**

Common Open Space Component	Size
<i>Exterior Common Space</i>	
Level 1 Courtyard	13,815 sf
<i>Interior Recreation Room(s)</i>	
Level 3	1,600 sf
Level 4 – Tower	5,000 sf
Level 19	<u>2,545 sf</u>
	9,145 sf
<i>Exterior Covered Decks</i>	
Level 4 – Parking Structure	5,050 sf
Levels 7 & 8	1,430 sf
Levels 15 & 16	1,430 sf
Level 19	<u>2,130 sf</u>
<i>Total Interior</i>	10,040 sf
Total	33,000 sf
<i>sf = square feet</i>	

Section 12.33 of the LAMC requires applicants of new residential projects to pay applicable park fees based on the number of residential units to be developed. However, in accordance with Section 12.33 C.3 of the LAMC, affordable housing units are exempt from the park fees payment requirements. Of the 685 proposed residential units, 676 units would be affordable units, and 9 units would be market-rate manager's units. Thus, the Project Applicant would be required to pay park fees for the 9 manager's units.

As discussed, the Project would meet LAMC open space requirements with the requested reductions, which are consistent with the Greater Downtown Housing Incentives, and would be required to pay applicable park fees. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) could result in an increase demand for parks and recreational services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of these projects would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

(v) Other public facilities?**Libraries**

Less Than Significant Impact. The libraries that serve the Project area include those shown on Table 6-58. On February 8, 2007, the Board of the Library Commissioners approved a new Branch Facilities Plan, which includes criteria for developing new libraries and recommends new size standards for the provision of Los Angeles Public Library (LAPL) facilities, including the following:¹⁵⁷

- A 12,500 square-foot facility for a community with less than 45,000 population.
- A 14,500 square-foot facility for a community with more than 45,000 population and up to a 20,000 square-foot for a Regional Branch.
- An additional Branch Library should be developed for a population equal to or in excess of 90,000 persons.

**Table 6-58
Libraries Serving the Project Area**

Library	Size (sf)	Collection Size/ Circulation	Staffing Levels	Service Population
Richard J. Riordan Central Library 630 5 th Street	538,000	Volumes - 2.6 million Circulation – 1.2 million	390 staff	3,792,622 39,818,605
Chinatown Branch Library 639 N. Hill Street	14,500	Volumes - 74,709 Circulation – 193,627	13.5 staff	11,225
Echo Park Branch Library 1410 W. Temple Street	17,543	Volumes – 43,689 Circulation – 93,418	9.5 staff	52,842
Little Tokyo Branch Library 203 S. Los Angeles St.	12,500	Volumes – 66,634 Circulation – 142,247	10 staff	45,796
Benjamin Franklin Branch Library 2200 E. 1 st Street	9,656	Volumes – 35,545 Circulation – 98,218	11 staff	40,319
<i>sf = square feet</i>				
<i>Source: Los Angeles Public Library, Thomas Jung, Management Analyst II, May 11, 2018. (Refer to Appendix L.)</i>				

¹⁵⁷ Los Angeles Public Library, Thomas Jung, Management Analyst II, May 11, 2018. (Refer to Appendix L.)

The purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The Project includes the development of up to 685 new residential dwelling units, including 451 permanent supportive units, an additional 225 units that would be affordable rental units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420 individuals, subject to the requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.¹⁵⁸ Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.¹⁵⁹ It is likely that the remaining 533 future residents already live in the City. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City.

Moreover, the Project would provide on-site computers, Internet access, and on-site library facilities, including an art and music library space, reference books, and other books for loan to Project residents. It is anticipated that most, if not all, of the demand for library services created by the Project would be accommodated by the Project. For these reasons, the Project would not create the need for new or expanded library facilities. Therefore, Project impacts related to library services would be less than significant.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City, and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

15. RECREATION

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

Less Than Significant Impact. Refer to the response to Checklist Question 14(a)(iv) (Public Services - Parks). A breakdown of common open space components for Site's 1 and 2 are shown on Tables 6-57 and 6-58, respectively. All of the Project's proposed 685 dwelling units would have fewer than three habitable rooms, for which LAMC Section 12.21 G requires 100 square feet of open space per dwelling unit.

¹⁵⁸ *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

¹⁵⁹ *1,420 maximum residents/685 units = 2.07 persons per unit.*

Based on this standard, the Project would be required to provide 68,500 square feet of open space. Pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), the Project Applicant is requesting to reduce the required open space square footage on Site 1 by 33 percent and increase the allowable square footage of interior and covered open space that can be counted toward the total open space requirement by 200 percent. For Site 2, the Project Applicant is requesting approval to increase the allowable square footage of interior and covered open space that can be counted toward the total open space requirement by 250 percent.

To encourage the development of affordable housing, the City's Greater Downtown Housing Incentive Area Ordinance allows for a 50 percent reduction of open space – a reduction that is larger reduction than the reductions requested by the Project Applicant. Even with the requested reductions, the Project would provide 59,060 square feet of open space, specifically tailored to formerly homeless individuals. The open spaces would include exterior and interior areas, providing passive enjoyment as well as allowing for an extensive array for social services for each resident. A portion of the open space areas is exterior spaces covered by building structure or trellis/solar arrays. Technically, these areas would not count toward the Project's LAMC-required open space requirements, but they would be an important amenity to high-density affordable housing.

Section 12.33 of the LAMC requires applicants of new residential projects to pay applicable park fees based on the number of residential units to be developed. However, in accordance with Section 12.33 C.3 of the LAMC, affordable housing units are exempt from the park fees payment requirements. Of the 685 proposed residential units, 676 units would be affordable units, and 9 units would be market-rate manager's units. Thus, the Project Applicant would be required to pay park fees for the 9 manager's units. As discussed, the Project would meet LAMC open space requirements and would be required to pay applicable park fees. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

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

Less Than Significant Impact. The Project includes development of private and public open space areas that are inclusive of the mixed-use development and are required to meet the City's open space requirement. The assessment of impacts associated with development of these open space facilities is inclusive of the assessment of impacts associated with the Project in its entirety. No direct significant impacts would occur as a result of development of the open space facilities.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question 14(a)(iv) (Public Services – Parks).

16. TRANSPORTATION/TRAFFIC

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all

modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant With Mitigation Incorporated. The analysis in this section is based on the following (refer to Appendix M):

- *Weingart Projects Traffic Impact Study, Linscott, Law & Greenspan Engineers, March 13, 2018.*
- *Transportation Impact Assessment for the Proposed Weingart Mixed-Use/Affordable Housing Projects, Clearance Letter, LADOT, May 3, 2018.*
- *Weingart Projects Construction Traffic Analysis, Linscott, Law & Greenspan Engineers, May 4, 2018.*

The Traffic Impact Study was approved by LADOT on May 3, 2018 (refer to Appendix M). Under SB 375, when going forward with an SCEA (such as this document), project-specific and cumulative impacts associated with cars and light trucks on the regional transportation network are not required to be assessed, pursuant to PRC 21155.2(b) and 21159.28(a). To the extent that these impacts are included herein is done so for informational purposes, only.

Study Intersections

Through coordination between Linscott, Law & Greenspan Engineers (LLG) and LADOT staff, seven study intersections were identified for evaluation during the weekday morning and afternoon peak hours. The study intersections provide both regional and local access to the study area and define the extent of the boundaries for this traffic impact analysis.

The traffic analysis study area generally comprises those locations that have the greatest potential to experience significant traffic impacts due to the Project, as defined by the City as Lead Agency under CEQA. In The traffic engineering practice, the study area generally includes those intersections that meeting the following criteria:

- a. Immediately adjacent or in close proximity to the project site;
- b. In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and
- c. In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

The study intersections selected for analysis were based on the above criteria, the Projects' calculated peak-hour vehicle trip generation, the anticipated distribution of Project vehicular trips, and existing intersection/corridor operations. LADOT confirmed the appropriateness of the seven study intersections when it entered into a traffic study Memorandum of Understanding (MOU) for the Project (refer to

Appendix M). The list of study intersections is presented on Table 6-59, and the study locations are shown on Figure 6-2.

Table 6-59
List of Study Intersections

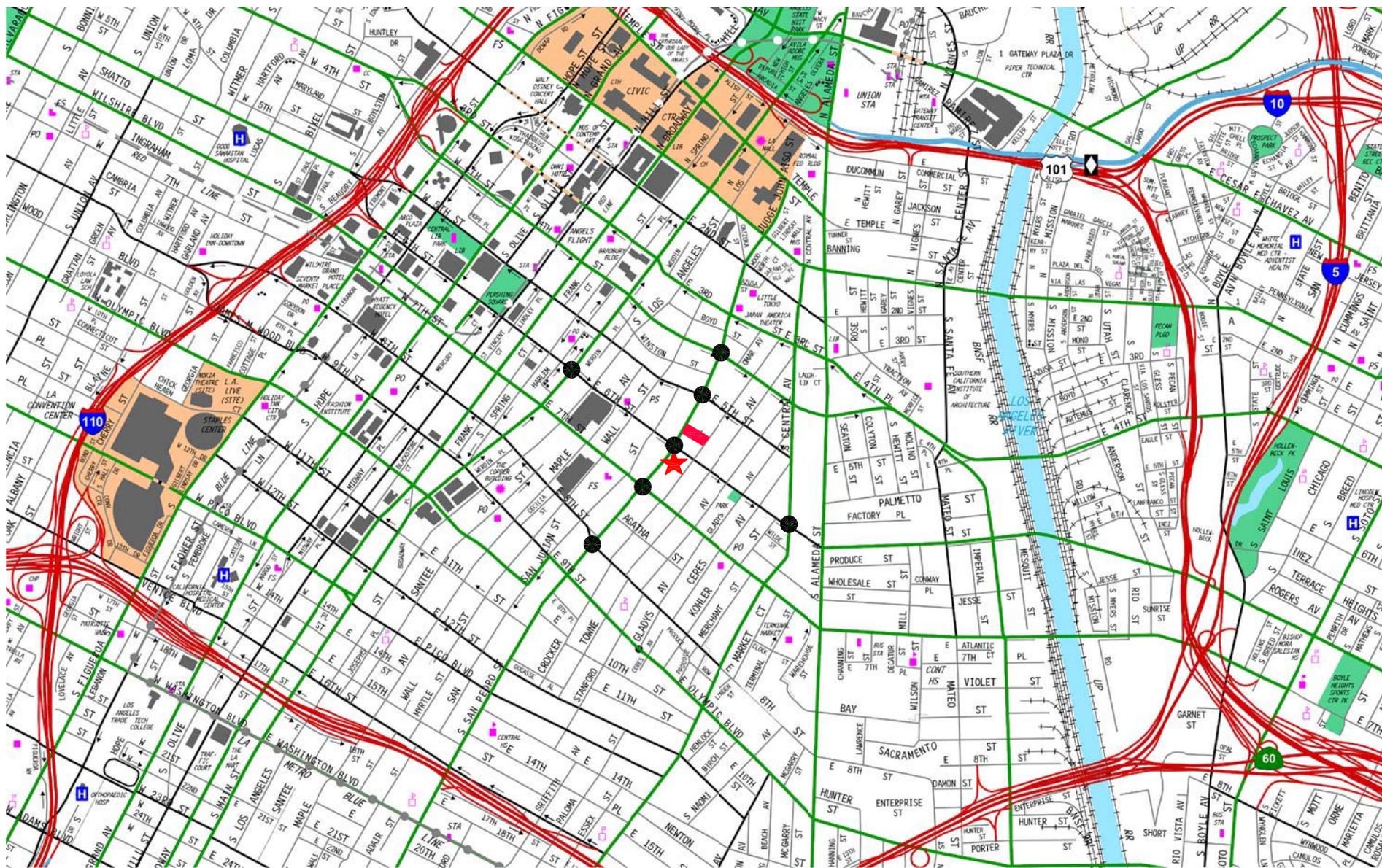
No.	Intersection	Traffic Control	Jurisdiction(s)
1	Los Angeles Street/6th Street	Signalized	City of Los Angeles
2	San Pedro Street/4th Street	Signalized	City of Los Angeles
3	San Pedro Street/5th Street	Signalized	City of Los Angeles
4	San Pedro Street/6th Street	Signalized	City of Los Angeles
5	San Pedro Street/7th Street	Signalized	City of Los Angeles
6	San Pedro Street/8th Street	Signalized	City of Los Angeles
7	Central Avenue/6th Street	Signalized	City of Los Angeles
<i>Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.</i>			

Methodologies

Based on LADOT’s Transportation Impact Study Guidelines (December 2016), this study uses the Critical Movement Analysis (CMA) methodology for the analysis and evaluation of traffic operations at signalized intersections under the City’s jurisdiction, as detailed in Circular Number 212 published by the Transportation Research Board (TRB).¹⁶⁰ This analysis technique describes the operating characteristics of an intersection in terms of the “Level of Service” (LOS) based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection (Capacity) and the quality of that traffic flow (LOS).

“Capacity” represents the maximum total hourly volume of vehicles in the critical lanes that has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movements or groups of movements which exhibit the highest “per lane” volumes, thus defining the maximum amount of vehicles attempting to travel through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more “lost” or “startup” time, as drivers exhibit slight reaction delays when signal indications change from “red” to “green.” For the CMA analysis methodology, the intersection capacities associated with the various levels of service are therefore based on the number of traffic signal phases, as shown on Table 6-60.

¹⁶⁰ *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*



MAP SOURCE: RAND MCNALLY & COMPANY

- █ WEINGART TOWERS PROJECT
- ★ SAN PEDRO TOWER PROJECT
- STUDY INTERSECTION



Figure 6-2
Study Area

Table 6-60
CMA Volume Ranges per LOS*

LOS	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	For or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA
* For planning applications only. Not appropriate for operations/design applications.			

For the intersection evaluation and transportation planning purposes of this traffic study, LADOT policy requires that the maximum “baseline” capacity of an intersection equate to the value associated with LOS E shown on Table 6-60. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

The “Critical Movement” indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This total traffic *volume* value, which represents the most critical intersection demand, is then divided by the appropriate intersection *capacity* value for the type of signal control at the intersection, to determine the “CMA value” for the intersection that is roughly equivalent to its volume-to-capacity ratio.

LOS describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designated, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown on Table 6-61.

**Table 6-61
LOS Definitions for Signalized Intersections (CMA Method)**

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.
<i>Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.</i>		

Existing Conditions

Existing Street System

Regional Highway System

Regional vehicular access to the Project Sites is provided by the U.S. 101 (Hollywood) Freeway. Additional freeways providing indirect access to the Project Sites include the I-10 (Santa Monica) Freeway and State Route 110/I-110 (Pasadena/Harbor) Freeway. Brief descriptions of the Hollywood Freeway, Pasadena/Harbor Freeway and Santa Monica Freeway are provided in the following paragraphs.

U.S. 101 (Hollywood) Freeway is generally a north-south oriented freeway connecting Downtown Los Angeles to the San Fernando Valley within the Los Angeles region. In the vicinity of the Project Sites, the U.S. 101 Freeway alignment runs in a northwest to southeast direction. Four mainline travel lanes are provided in each direction on the U.S. 101 Freeway. Within the general area of the Project Sites, on and/or off-ramps are provided at Broadway-Aliso Street, Spring Street, Los Angeles Street, and Alameda Street.

SR-110/I-110 (Pasadena/Harbor) Freeway is a major north-south oriented freeway connecting Pasadena to the north with the San Pedro area to the south. The SR-110/I-110 Freeway generally contains four mainline freeway lanes in each direction in the vicinity of the Project Sites. The Harbor Freeway Transitway located south of the Project Sites and Downtown Los Angeles, includes two elevated express

lanes in each direction (which requires the use of a FasTrak Flex transponder). Within the general area of the Project Sites, on and/or off-ramps are provided at 3rd Street, 4th Street, 5th Street, and 6th Street.

I-10 (Santa Monica) Freeway is a major east-west oriented freeway connecting Santa Monica to the west to the Inland Empire to the east. The I-10 Freeway generally contains four mainline freeway lanes in each direction along with auxiliary lanes in the Downtown area. Within the general area of the Project Sites, in the eastbound direction on the I-10 Freeway, off-ramps are provided at Grand Avenue and Maple Street. In the westbound direction on the I-10 Freeway, off-ramps are provided at Los Angeles Street and Hoover Street/20th Street.

Roadway Classifications

The City utilizes the roadway categories recognized by regional, state, and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

Freeways are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.

Arterial roadways are major streets (e.g., Boulevard and Avenue designations) that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commute traffic.

Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

Local roadways distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

Alleys are common throughout the Downtown area as well as throughout the City. Alleys parallel to major and secondary highways provide an essential service function, enable limitations on curb cuts, and assist traffic flow on arterial streets.

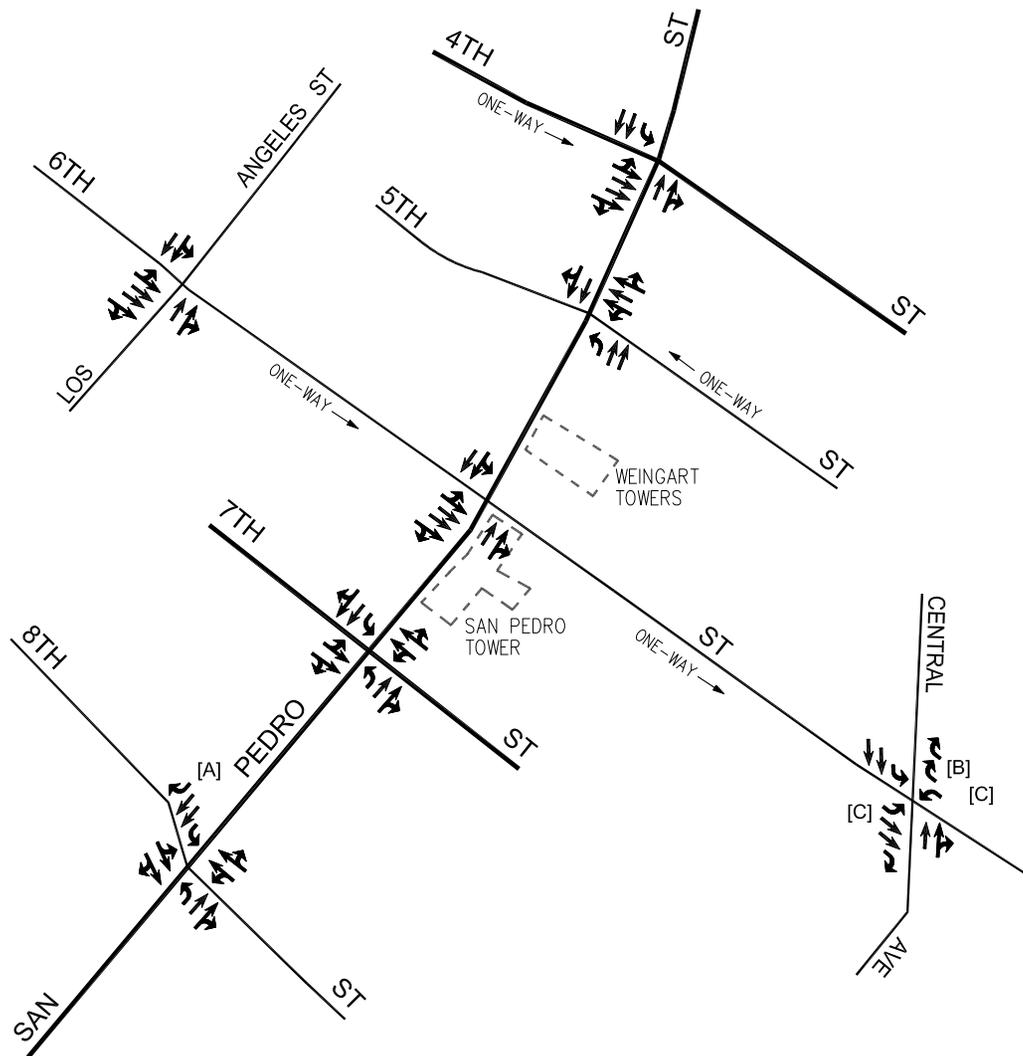
Local Street System

All seven study intersections are currently controlled by traffic signals. The existing roadway configurations and intersection controls at the study intersections are displayed on Figure 6-3, and descriptions of the existing roadways (e.g., number of travel lanes, median type, and speed limit) are provided on Table 6-62.

Transit Services

Extensive public bus and rail transit service is provided within the Project study area. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello Bus Lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted previously, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 95 (Rider's Paradise) out of 100 for the Project Sites.¹⁶¹ A summary of the existing transit service, including the transit route, destinations and peak-hour headways is presented on Table 6-63. The existing public transit routes in the vicinity of the Project Sites are illustrated on Figure 6-4.

¹⁶¹ Refer to <http://www.walkscore.com/>, which generates the transit score for the project site. Walk Score calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for using transit service.



- [- - -] PROJECT SITES
- [A] NOT PART OF SIGNAL
- [B] NO RIGHT-TURN ON RED
- [C] SPLIT PHASE OPERATION



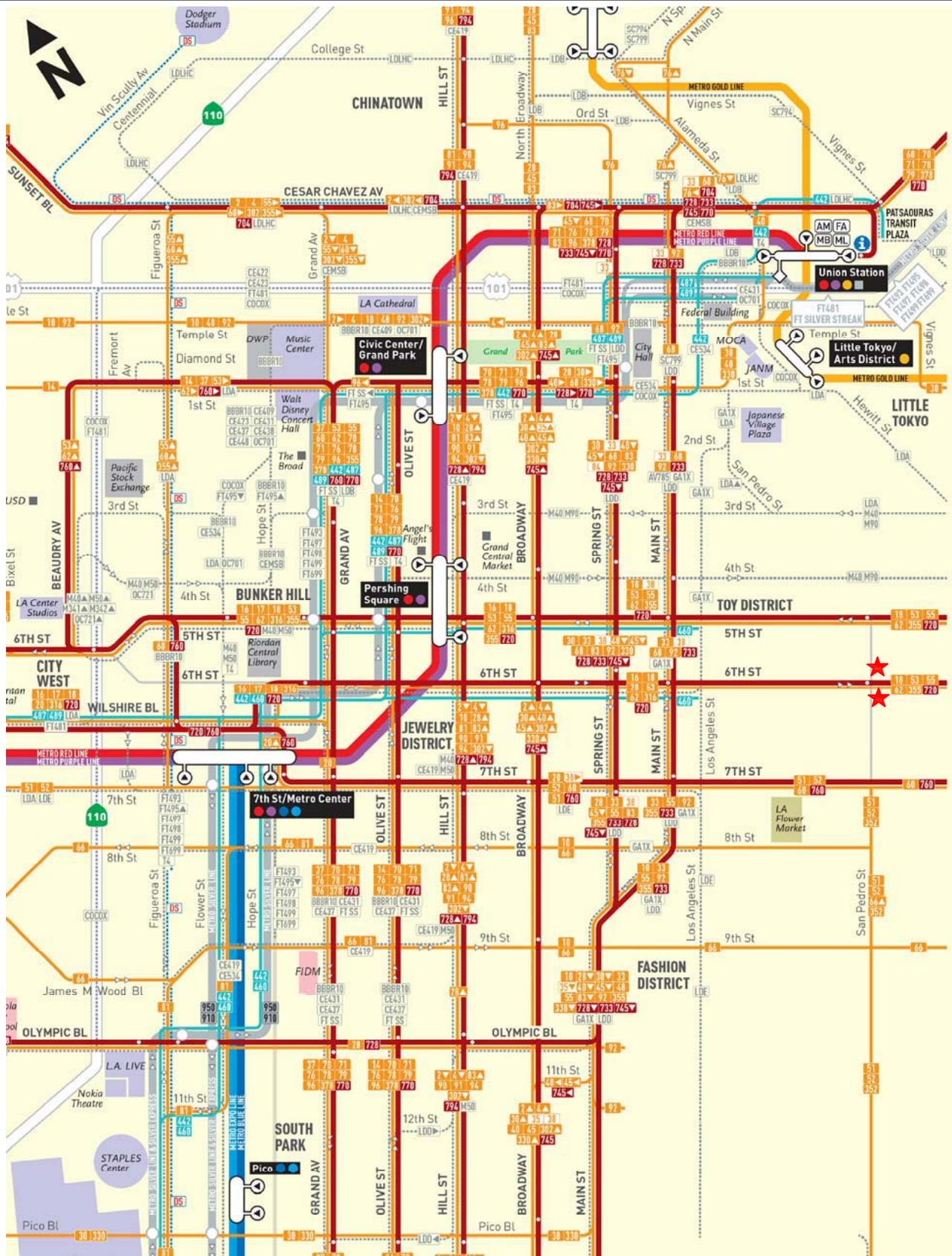
Figure 6-3
Existing Lane Configurations

**Table 6-62
Existing Roadway Descriptions**

Roadway	Classification [1]	Travel Lanes		Median Types [4]
		Direction [2]	No. Lanes [3]	
Los Angeles Street	Avenue II	N-S	4	N/A
San Pedro Street (East of Los Angeles Street)	Avenue II	N-S	4	N/A
Central Avenue (9 th St to 2 nd St)	Avenue I	N-S	4	2WLT/NA
4 th Street (Broadway to San Pedro St)	Avenue III	E	4	N/A
4 th Street (San Pedro St to Alameda St)	Avenue II	E	4	N/A
5 th Street (Broadway to Los Angeles St)	Avenue III	W	4	N/A
5 th Street (Los Angeles St to Alameda St)	Avenue II	W	4	N/A
6 th Street (Flower St to Los Angeles St)	Avenue III	E	4	N/A
6 th Street (Los Angeles St to Central Ave)	Avenue II	E	4	N/A
6 th Street (Central Ave to Mateo St)	Avenue II	E-W	4	N/A
7 th Street	Avenue II	E-W	4	N/A
8 th Street (Olive St to Main St)	Avenue III	E-W	4	N/A
8 th Street (Main St to Central Ave)	Avenue II	E-W	4	N/A
<p><i>Notes:</i></p> <p>[1] Roadway classifications obtained from the City of Los Angeles Mobility Plan 2035, Adopted January 20, 2016.</p> <p>[2] Direction of roadways in the project area: NB-SB – northbound and southbound; and EB-WB – eastbound and westbound.</p> <p>[3] Number of lanes in both directions of the roadway.</p> <p>[4] Median type of the road RMI – Raised Median Island; 2 WLT – 2-Way Left-Turn Lane; and N/A – Not Applicable.</p> <p>Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.</p>				

**Table 6-63
Existing Transit Routes [1]**

Route	Destinations	Roadway(s) Near the Project Sites	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 17	Century City to Downtown Los Angeles via Culver City, West Hollywood, Beverly Grove, Hancock Park and Los Angeles	Los Angeles Street, 6th Street	EB WB	2 2	2 2
Metro 18	Wilshire Center to Montebello via Downtown Los Angeles, Boyle Heights and East Los Angeles	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street	EB WB	6 6	8 11
Metro 51/52/352	Wilshire Center to Compton via Westlake, Downtown Los Angeles, Los Angeles and Harbor Gateway	San Pedro Street, 7th Street, 8th Street	NB SB	15 14	14 13
Metro 53	Carson to Downtown Los Angeles via Compton and Los Angeles	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street	NB SB	11 5	5 8
Metro 60	Downtown Los Angeles to Compton via Vernon, Southgate and Lynwood	San Pedro Street, 7th Street	NB SB	8 9	9 10
Metro 62	Downtown Los Angeles to Hawaiian Gardens via Boyle Heights, Commerce, Downey, Norwalk and Cerritos	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street,	EB WB	3 3	3 3
Metro 720	Santa Monica to Commerce via Westwood and Los Angeles	San Pedro Street, Central Avenue, 5th Street, 6th Street	EB WB	6 19	18 8
Metro 760	Lynwood to Downtown Los Angeles via South Gate and Huntington Park	San Pedro Street, 7th Street	NB SB	5 4	5 5
Gardena Line 1X	Redondo Beach to Downtown Los Angeles via Torrance and Gardena	Los Angeles Street, 6th Street	NB SB	2 2	2 2
Montebello 40	Whittier to Downtown Los Angeles via Pico Rivera, Montebello and East Los Angeles	San Pedro Street, 4th Street	EB WB	6 6	6 6
Montebello 90	Whittier to Downtown Los Angeles via Pico Rivera, Montebello and East Los Angeles	San Pedro Street, 4th Street	EB WB	2 3	3 2
TOTAL				139	145
<i>[1] Sources: Los Angeles County Metropolitan Transportation Authority (Metro), City of Gardena Transit and City of Montebello Bus Lines, websites, 2018.</i>					



MAP SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY (METRO) WEBSITE NOVEMBER 2017

★ PROJECT SITES

Figure 6-4
Existing Public Transit Routes

Traffic Counts

Manual counts of vehicular turning movements were conducted at each of the study intersections listed on Table 6-59 during the weekday morning (AM) and afternoon (PM) commute periods to determine the peak-hour traffic volumes. The manual counts were conducted by an independent traffic count subconsultant (The Traffic Solution) at the study intersections from 7:00 to 10:00 AM to determine the weekday AM peak commute hour, and from 3:00 to 6:00 PM to determine the weekday PM peak commute hour. In conjunction with the manual turning movement vehicle counts, a count of bicycle and pedestrian volumes were also collected during the peak periods. It is noted that all of the traffic counts were conducted when local schools were in session. Traffic volumes at the study intersections show the typical peak periods between 7:00 to 10:00 AM and 3:00 to 6:00 PM generally associated with metropolitan Los Angeles weekday peak commute hours.

The weekday and weekend peak-hour manual counts of vehicle movements at the study intersections are summarized on Table 6-64. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown on Figures 6-5 and 6-6, respectively.

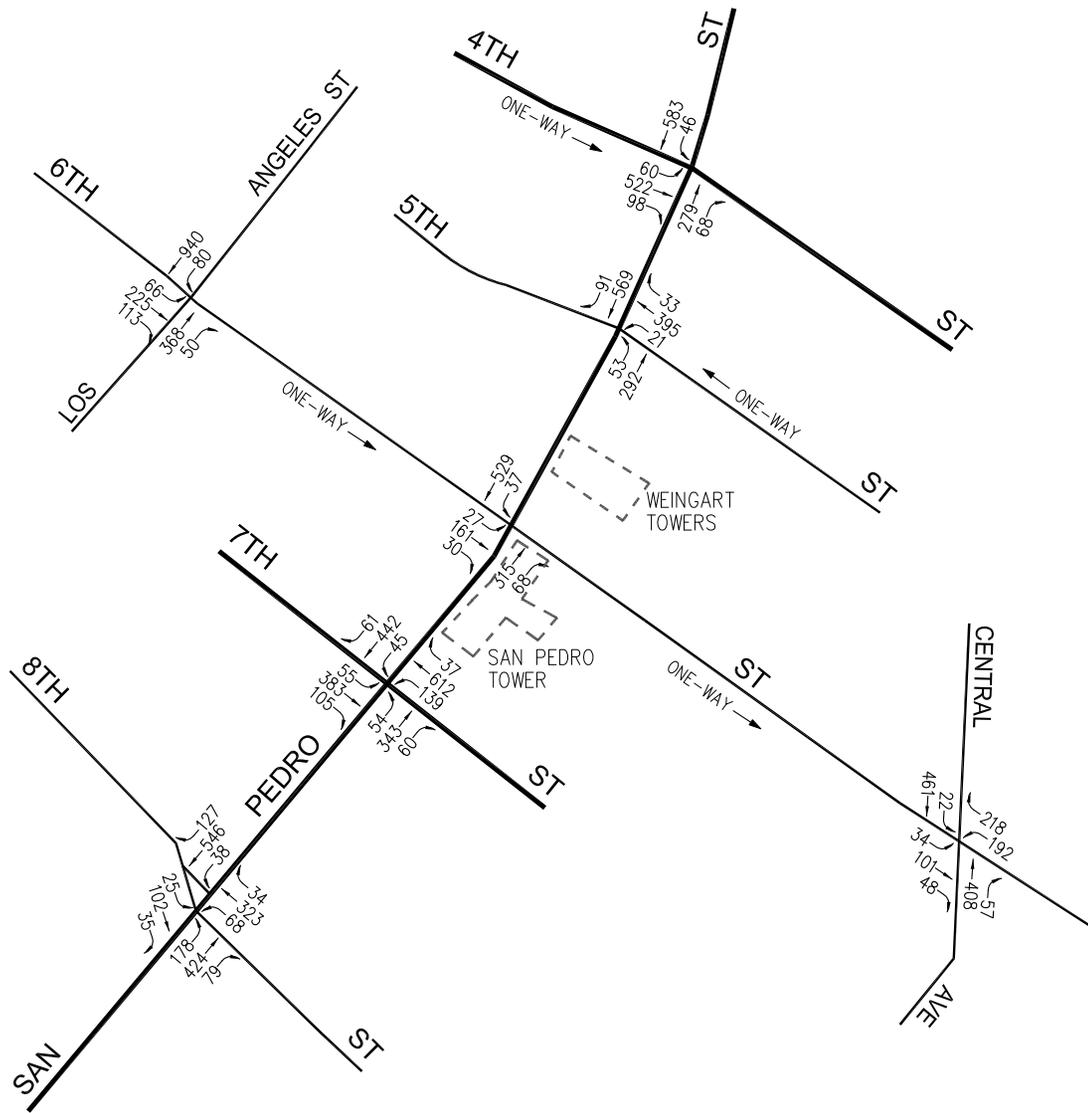
Existing LOS

As indicated in column [1] of Table 6-65, all seven study intersections are currently operating at LOS A during the weekday AM and PM peak hours under existing conditions. These operating conditions at the study intersections reflect the one-way travel patterns of the east-west oriented roadways (i.e., 4th Street, 5th Street, 6th Street) that reduce the number of conflicts for critical movements.

**Table 6-64
Existing Traffic Volumes – Weekday AM and PM Peak Hours**

No.	Date	DIR	AM Peak Hour		PM Peak Hour		
			Began	Volume	Began	Volume	
1	Los Angeles Street/ 6th Street	10/12/2017	NB	7:15	418	5:00	975
			SB		1,020		798
			EB		404		821
			WB		0		0
2	San Pedro Street/ 4th Street	10/12/2017	NB	7:15	347	5:00	813
			SB		629		445
			EB		680		1,651
			WB		0		0
3	San Pedro Street/ 5th Street	10/12/2017	NB	7:15	345	5:00	769
			SB		660		476
			EB		0		0
			WB		449		360
4	San Pedro Street/ 6th Street	10/12/2017	NB	7:15	383	5:00	751
			SB		566		452
			EB		218		777
			WB		0		0
5	San Pedro Street/ 7th Street	10/12/2017	NB	7:15	457	5:00	775
			SB		548		494
			EB		543		774
			WB		788		683
6	San Pedro Street/ 8th Street	10/12/2017	NB	7:15	681	5:00	904
			SB		711		639
			EB		162		358
			WB		425		508
7	Central Avenue/ 6th Street	10/12/2017	NB	7:15	465	5:00	916
			SB		483		482
			EB		183		678
			WB		410		373

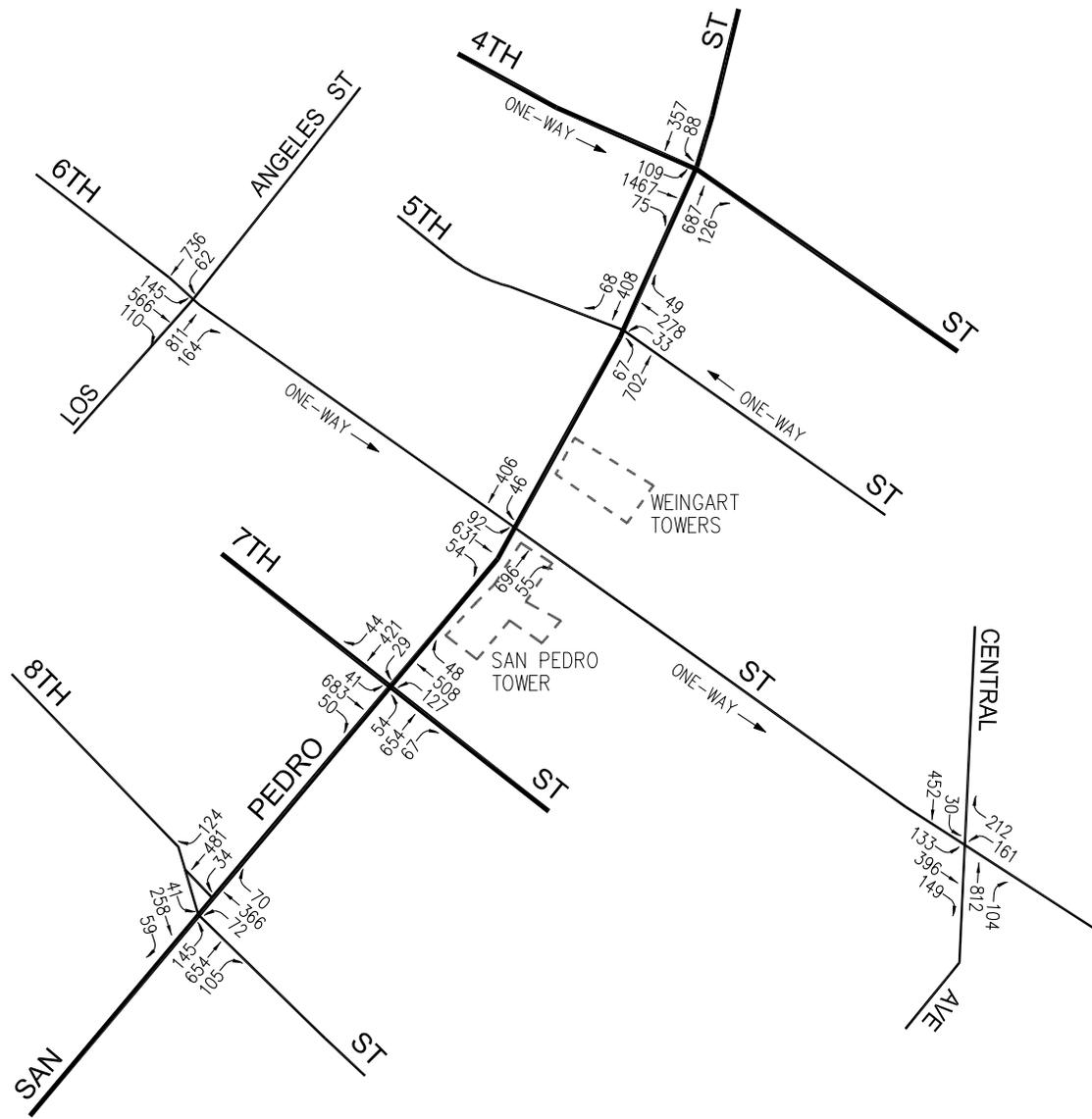
Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.



[- - -] PROJECT SITES



Figure 6-5
Existing Traffic Volumes
Weekday AM Peak Hour



[- - -] PROJECT SITES



Figure 6-6
Existing Traffic Volumes
Weekday PM Peak Hour

Table 6-65
Summary of Volume to Capacity Ratios and Levels of Service
Weekday AM and PM Peak Hours

No	Study Intersection	Peak Hour	[1]		[2]				[3]		[4]			
			Year 2017 Existing		Year 2017 Existing With Project		Change V/C	Signif Impact	Year 2025 Future W/O Project		Year 2025 Future with Project		Change V/C	Signif Impact
			V/C	LOS	V/C	LOS	[(2)-(1)]	[a]	V/C	LOS	V/C	LOS	[(4)-(3)]	[a]
1	Los Angeles Street/ 6th Street	AM	0.342	A	0.353	A	0.011	No	0.545	A	0.556	A	0.011	No
		PM	0.403	A	0.407	A	0.004	No	0.617	B	0.625	B	0.008	No
2	San Pedro Street/ 4th Street	AM	0.208	A	0.211	A	0.003	No	0.291	A	0.293	A	0.002	No
		PM	0.505	A	0.515	A	0.010	No	0.632	B	0.641	B	0.009	No
3	San Pedro Street/ 5th Street	AM	0.255	A	0.273	A	0.018	No	0.375	A	0.392	A	0.017	No
		PM	0.214	A	0.225	A	0.011	No	0.379	A	0.389	A	0.010	No
4	San Pedro Street/ 6th Street	AM	0.138	A	0.143	A	0.005	No	0.251	A	0.287	A	0.036	No
		PM	0.311	A	0.335	A	0.024	No	0.457	A	0.482	A	0.025	No
5	San Pedro Street/ 7th Street	AM	0.450	A	0.480	A	0.030	No	0.715	C	0.753	C	0.038	No
		PM	0.542	A	0.579	A	0.037	No	0.735	C	0.769	C	0.034	No
6	San Pedro Street/ 8th Street	AM	0.359	A	0.371	A	0.012	No	0.507	A	0.519	A	0.012	No
		PM	0.397	A	0.407	A	0.010	No	0.566	A	0.576	A	0.010	No
7	Central Avenue/ 6th Street	AM	0.262	A	0.277	A	0.015	No	0.492	A	0.507	A	0.015	No
		PM	0.516	A	0.529	A	0.013	No	0.797	C	0.810	D	0.013	No

[a] According to LADOT's "Transportation Impact Study Guidelines," December 2016, a transportation impact on an intersection shall be deemed significant in accordance with the following table:

Final v/c	LOS	Project Related Increase in V/C
>0.701 – 0.800	C	equal to or greater than 00.040
>0.801 – 0.900	D	equal to or greater than 0.020
>0.901	E/F	equal to or greater than 0.010

Source: Linscott, Law & Greenspan, 2018. Refer to Appendix M.

Threshold of Significance

LADOT's significance criteria for determining intersection LOS impacts are shown on Table 6-66.

Table 6-66
LADOT Intersection Significance Thresholds

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	V/C	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

Source: LADOT.

Project Impacts – Intersection LOS

Trip Generation

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes to be generated by the Project were forecast for the weekday AM and PM peak hours, over a 24-hour period. Generation rates provided in the ITE *Trip Generation Manual* were utilized to forecast traffic generation for the Project. Traffic volumes expected to be generated by the Project's general office and commercial (i.e., retail) land use components were based upon the following ITE trip generation average rates:

- ITE Land Use Code 710: General Office Building
- ITE Land Use Code 820: Shopping Center

The kitchen/dining room and flex space planned for the Project would provide meals for residents and area homeless during breakfast, lunch and dinner. At other times this space may be used for other activities. It was deemed appropriate to estimate trips for this space only for service and delivery by selecting an ITE land use category (ITE 110, General Light Industrial) that could approximate these trips.

As the ITE publication does not provide trip rates for a land use such as the Project's specific residential land use component, it was deemed appropriate to forecast the trips expected to be generated by the affordable housing land use component using trip rates recently published by LADOT that are directly applicable to the Project. LADOT trip generation rates for affordable housing projects were published in November 2016, and developed based on vehicle trip count data collected at affordable housing sites in the City during year 2016. The LADOT affordable housing trip rates include three different housing type categories: affordable family housing, and affordable special needs and supportive housing. In this instance, the affordable family and affordable special needs and supportive housing category are directly applicable to the proposed Project, which would provide housing for permanent long-term tenants with supportive services designed to enable homeless persons and individuals/families at risk of homelessness

to ensure that they remain housed and live as independently as possible. LADOT's affordable family and affordable special needs and supportive housing category trip rates are summarized below.

Affordable Family Housing

- Average Daily Trip Rate: 4.08 trips per dwelling unit
- Average AM Peak-Hour Trip Rate: 0.50 trips per dwelling unit; 40 percent inbound and 60 percent outbound
- Average PM Peak-Hour Trip Rate: 0.34 trips per dwelling unit; 55 percent inbound and 45 percent outbound

Affordable Special Needs and Supportive Housing

- Average Daily Trip Rate: 1.27 trips per dwelling unit
- Average AM Peak-Hour Trip Rate: 0.12 trips per dwelling unit; 44 percent inbound and 56 percent outbound
- Average PM Peak-Hour Trip Rate: 0.12 trips per dwelling unit; 59 percent inbound and 41 percent outbound

The ITE manual contains trip rates for a variety of land uses (including office buildings, shopping centers, condominiums, etc.), which have been derived based on traffic counts conducted at existing sites. However, the traffic count data submitted to ITE is for free-standing sites generally located in suburban locations, which likely do not reflect the trip generation characteristics for projects located in urban areas such as the City of Los Angeles's transit oriented district (TOD) areas. Thus, the trip rates provided in the ITE *Trip Generation Manual* (derived from traffic counts at suburban projects) overstate the trip generation potential of projects located within the Downtown Los Angeles area, including the Project.

For the Project, it is reasonable to conclude that its primary land use component (i.e., affordable housing), location in Downtown Los Angeles near multimodal corridors, and proximity to rail lines would result in a significant reduction in vehicle trips as compared to the trip forecasts that would otherwise be calculated using the applicable and unadjusted ITE trip rates in a passively managed traffic management condition. An actively managed site could be expected to yield additional trip reductions. Thus, based on criteria contained in Section 3.3B of LADOT's Transportation Impact Study Guidelines and recent Downtown Los Angeles project experience, conservative adjustments were made to the Project's general office land use component trip generation forecasts to account for transit usage, walkability and internal capture as follows:

- 5 percent transit adjustment
- 5 percent walk adjustment

- 5 percent internal capture adjustment

For the Project's commercial (i.e., retail) land use components, a forecast was made of likely pass-by trips that could be anticipated at the sites. Pass-by trips are intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing a site on an adjacent street or roadway that offers direct access to the site. The pass-by traffic forecast has been estimated based on existing traffic volumes in the vicinity of the Project Sites and the *LADOT Policy on Pass-by Trips*. Pass-by adjustments have been applied to the weekday AM and PM peak-hour traffic volume forecasts, as well as to the daily traffic volume forecasts, for the Project's commercial land use components.

In addition to the Project trip generation forecasts, forecasts also were made for the existing land uses at the Project Sites. Although the existing site use (Weingart Café) on Site 1 is a functional restaurant, it serves the homeless and does not function as a typical restaurant. As such, it was determined appropriate to estimate existing site trips only for service and delivery trips by selecting an ITE land use category (i.e., ITE Code 110, General Light Industrial) that could approximate these trips.

The trip generation rates and forecast of the vehicular trips anticipated to be generated by the Project are presented on Table 6-67. As summarized on the table, the Project would generate a net increase of 229 trips (120 inbound trips and 109 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project would generate a net increase of 197 trips (91 inbound trips and 106 outbound trips). Over a 24-hour period, the Project would generate a net increase of 2,038 trips (1,019 inbound trips and 1,019 outbound trips) during a typical weekday.

**Table 6-67
Project Trip Generation [1]**

Land Use	Size		Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
				In	Out	Total	In	Out	Total
Site 1 [3]									
Affordable Housing - Supportive [4]	302	DU	384	16	20	36	21	15	36
Affordable Housing - Family [5]	76	DU	310	15	23	38	14	12	26
Manager Apartment [6]	4	DU	27	0	2	2	1	1	2
Commercial [7]	2,250	GLSF	96	1	1	2	4	4	8
- Less 50% Pass-by [8]			(48)	(1)	(1)	(2)	(2)	(2)	(4)
General Office [9]	19,030	GSF	210	26	4	30	5	23	28
- Less Transit Adjustment (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
- Less Walk Adjustment (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
- Less Internal Capture (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
Dining Room/Flex Space [11]	11,463	GSF	80	10	1	11	1	10	11
Site 1 Subtotal			1,026	64	50	114	44	60	104
Site 2 [3]									
Affordable Housing - Supportive [4]	149	DU	189	8	10	18	11	7	18
Affordable Housing - Family [5]	149	DU	608	30	45	75	28	23	51
Manager Apartment [6]	5	DU	33	1	2	3	2	1	3
Commercial [7]	3,200	GLSF	137	2	1	3	6	6	12
- Less 50% Pass-by [8]			(69)	(1)	(1)	(2)	(3)	(3)	(6)
General Office [9]	17,100	GSF	189	24	3	27	4	21	25
- Less Transit Adjustment (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
- Less Walk Adjustment (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
- Less Internal Capture (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
Site 2 Subtotal			1,060	61	60	121	48	52	100
Sits 1 & 2 Subtotal			2,086	125	110	235	92	112	204
Less Existing Site 1 Development									
Weingart Cafe [12]	(7,000)	GSF	(48)	(5)	(1)	(6)	(1)	(6)	(7)
TOTAL			2,038	120	109	229	91	106	197
<p>[1] Source: City of Los Angeles Department of Transportation (LADOT), November 2016; and ITE "Trip Generation Manual," 9th Edition, 2012.</p> <p>[2] Trips are one-way traffic movements, entering or leaving.</p> <p>[3] Refer to Section 2 (Project Description) for a description of the specific proposed land uses.</p> <p>[4] LADOT trip generation average rates for affordable housing type Special Needs & Supportive Housing. - Daily Trip Rate: 1.27 trips/dwelling unit; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.12 trips/dwelling unit; 44% inbound/56% outbound - PM Peak Hour Trip Rate: 0.12 trips/dwelling unit; 59% inbound/41% outbound</p> <p>[5] LADOT trip generation average rates for affordable housing type Family. - Daily Trip Rate: 4.08 trips/dwelling unit; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.50 trips/dwelling unit; 40% inbound/60% outbound - PM Peak Hour Trip Rate: 0.34 trips/dwelling unit; 55% inbound/45% outbound</p> <p>[6] ITE Land Use Code 220 (Apartment) trip generation average rates. - Daily Trip Rate: 6.65 trips/dwelling unit; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.51 trips/dwelling units; 20% inbound/80% outbound - PM Peak Hour Trip Rate: 0.62 trips/dwelling units; 65% inbound/35% outbound</p> <p>[7] ITE Land Use Code 820 (Shopping Center) trip generation average rates. - Daily Trip Rate: 42.7 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.96 trips/1,000 SF of floor area; 62% inbound/38% outbound - PM Peak Hour Trip Rate: 3.71 trips/1,000 SF of floor area; 48% inbound/52% outbound</p> <p>[8] Source: LADOT policy on pass-by trip adjustments. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from the traffic passing the site on an adjacent street or</p>									

Table 6-67
Project Trip Generation [1]

Land Use	Size	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			In	Out	Total	In	Out	Total
<p>roadway that offers direct access to the site.</p> <p>[9] ITE Land Use Code 710 (General Office Building) trip generation average rates.</p> <ul style="list-style-type: none"> - Daily Trip Rate: 11.03 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 1.56 trips/1,000 SF of floor area; 88% inbound/12% outbound - PM Peak Hour Trip Rate: 1.49 trips/1,000 SF of floor area; 17% inbound/83% outbound <p>The Project plans for Site 2 show 12,100 square feet of office land uses. However, this SCEA assumes an additional 5,000 square feet of office land uses to allow for flexibility in the mix of non-residential land uses needed to accommodate the programming needs of the Project and to ensure that the potential environmental impacts associated with the change in mix of uses have been accounted for.</p> <p>[10] Transit, walk and Downtown Los Angeles trip adjustments are based on site's proximity to Metro rail and bus transit opportunities and the two project site locations.</p> <p>[11] The planned kitchen/dining room/flex space will provide meals for residents and area homeless during breakfast, lunch and dinner. At other times this space may be used for other activities. It was deemed appropriate to estimate trips for this space only for service and delivery by selecting an ITE land use category (ITE 110, General Light Industrial) that could approximate these trips.</p> <p>ITE Land Use Code 110 (General Light Industrial) trip generation average rates.</p> <ul style="list-style-type: none"> - Daily Trip Rate: 6.97 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.92 trips/1,000 SF of floor area; 88% inbound/12% outbound - PM Peak Hour Trip Rate: 0.97 trips/1,000 SF of floor area; 12% inbound/88% outbound <p>[12] Although the existing site use (Weingart Café) for Site 1 is a functional restaurant, it serves the homeless and does not operate as a typical restaurant. It was determined appropriate to estimate existing site trips only for service and delivery trips by selecting an ITE land use category (ITE Code 110, General Light Industrial) that could approximate these trips.</p> <p>ITE Land Use Code 110 (General Light Industrial) trip generation average rates.</p> <ul style="list-style-type: none"> - Daily Trip Rate: 6.97 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.92 trips/1,000 SF of floor area; 88% inbound/12% outbound - PM Peak Hour Trip Rate: 0.97 trips/1,000 SF of floor area; 12% inbound/88% outbound <p>Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.</p>								

Project Traffic Distribution and Assignment

Project traffic volumes both entering and exiting the Project Sites have been distributed and assigned to the adjacent street system based on the following considerations:

- The sites' proximity to major traffic corridors (i.e., Los Angeles Street, San Pedro Street, Central Avenue, 4th Street, 5th Street, 6th Street, etc.);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress scheme planned for the Project, including the restricted right-turn ingress/egress access scheme for Site 2;
- Nearby population and employment centers; and
- Input from LADOT staff.

The general, directional traffic distribution pattern for the Project are presented on Figures 6-7 through 6-10.

The forecast weekday AM and PM peak-hour traffic volumes at the study intersections associated with the Project are presented on Figures 6-11 and 6-12, respectively. The traffic volume assignments presented on these figures reflect the traffic distribution characteristics shown on Figures 6-7 through 6-10 and the Project traffic generation forecasts presented on Table 6-67. It is noted that the commercial component trip distribution pattern for Site 1 (i.e., refer to Figure 6-5) has been utilized for the existing use on Site 1.

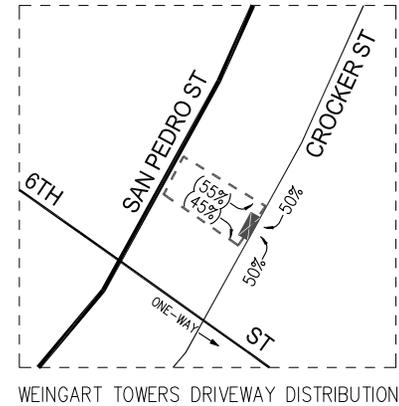
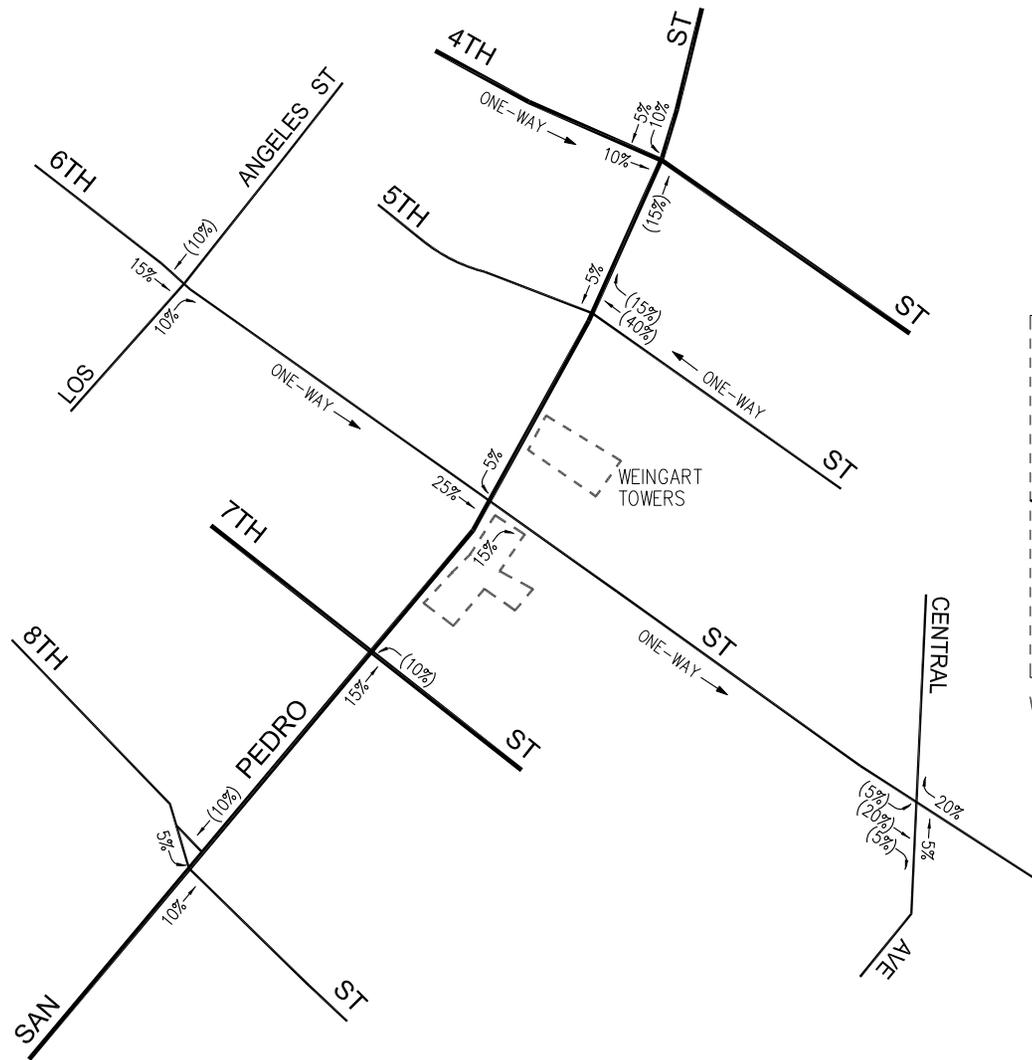
Existing (2017) With Project Intersection LOS Impacts

The existing with Project traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated on Figures 6-13 and 6-14, respectively. As shown in column [2] on Table 6-65, application of the City's threshold criteria to the "Existing With Project" scenario indicates that the Project would not result in significant impacts at any of the seven study intersections. Therefore, Project impacts related to intersection LOS would be less than significant.

Future (2025) Intersection LOS Impacts

Related Projects

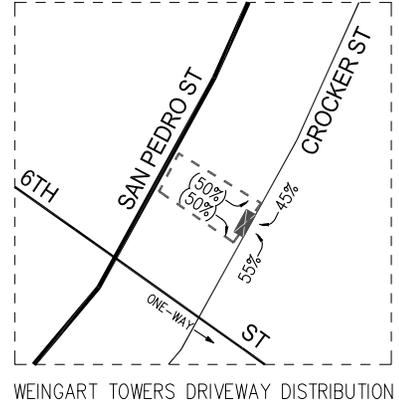
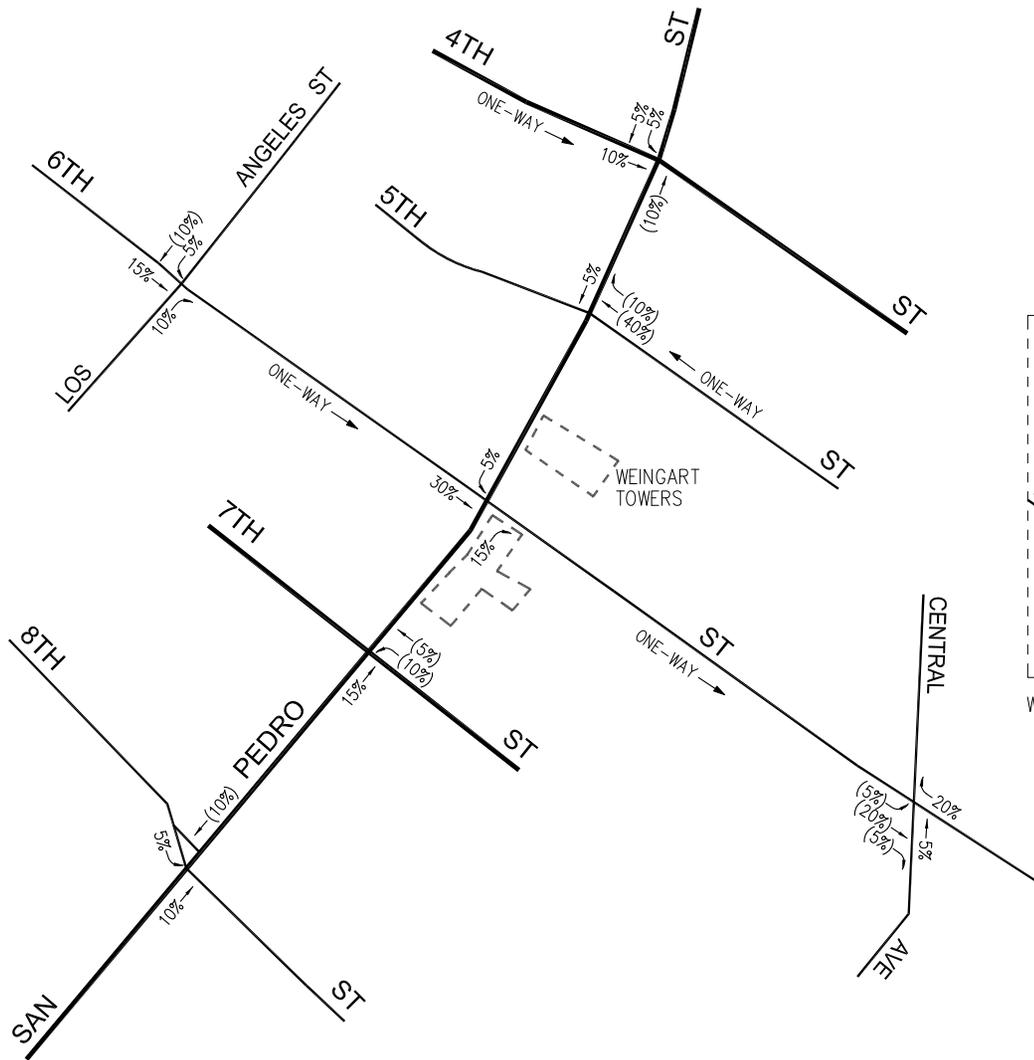
A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area (i.e., within an approximate 1.5-mile radius from the Project Sites, which is the range that LADOT uses when assessing cumulative impacts). With this information, the potential impact of the Project was evaluated within the context of the cumulative impacts of all ongoing development. The related projects research was based on information on file with both LADOT and LADCP. For LADOT, a list of related projects was obtained from LADOT at the time of preparation of the MOU for the approximately 1.5-mile radius from the Project Sites. For LADCP, the research included, but was not limited to, a review of proposed development projects within the Central City and Central City North community plan areas, proposed development projects within an approximate 1.5-mile radius from the Projects Sites for which EIRs are being or have been prepared (as shown on the Major Projects section of LADCP's website), and LADCP's bi-weekly case filing reports. In addition, related projects lists from recently approved traffic study MOU and traffic studies in the vicinity of the Project Sites also were reviewed. The list of related projects is presented on Table 6-68. The location of the related projects is shown on Figure 2-1 in Section 2 (Project Description).



[] PROJECT SITES
 XX = INBOUND PERCENTAGE
 (XX) = OUTBOUND PERCENTAGE



Figure 6-7
 Project Trip Distribution - Site 1
 Residential Component

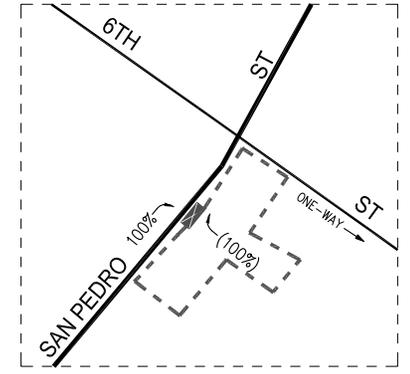
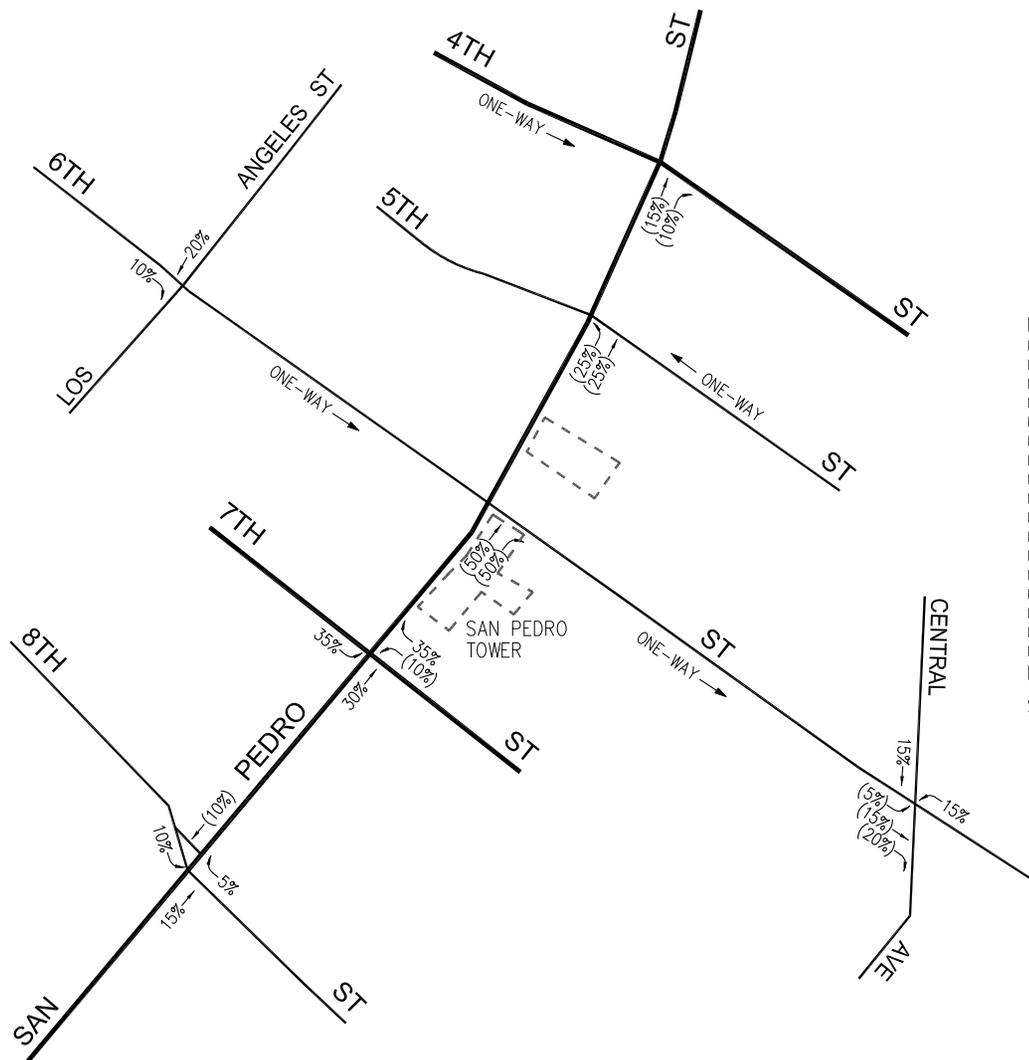


[] PROJECT SITES
 XX = INBOUND PERCENTAGE
 (XX) = OUTBOUND PERCENTAGE



Figure 6-8
 Project Trip Distribution - Site 1
 Commercial Component

Source: Linscott, Law & Greenspan, Engineers, 2018.

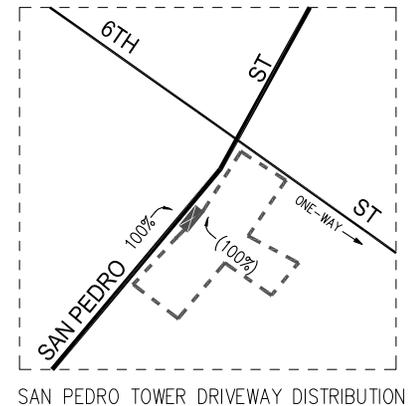
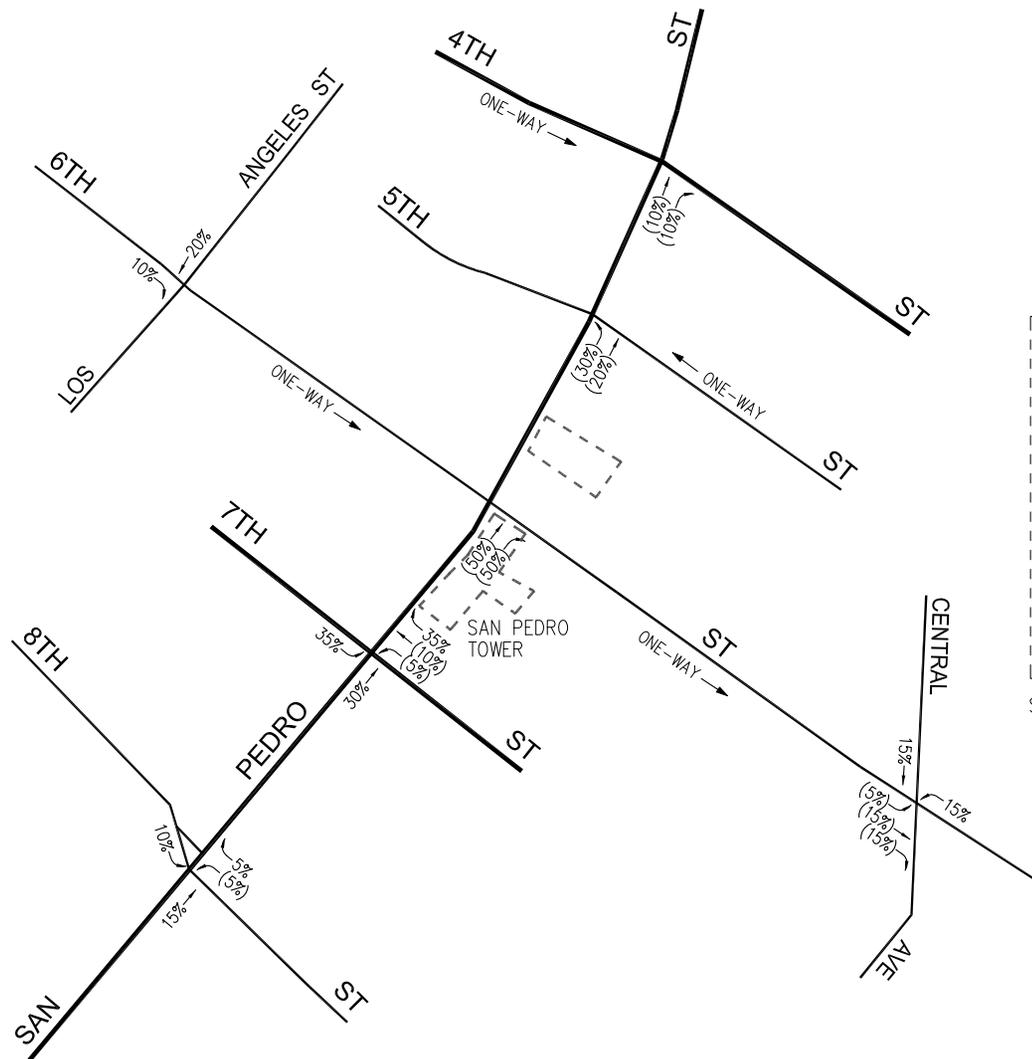


[- - -] PROJECT SITES
 XX = INBOUND PERCENTAGE
 (XX) = OUTBOUND PERCENTAGE



Figure 6-9
 Project Trip Distribution - Site 2
 Residential Component

Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES
 XX = INBOUND PERCENTAGE
 (XX) = OUTBOUND PERCENTAGE



Figure 6-10
 Project Trip Distribution - Site 2
 Commercial Component

Source: Linscott, Law & Greenspan, Engineers, 2018.

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
1	Proposed	220 East Washington Boulevard	Specialty Retail Restaurant Apartment	7,750 7,750 357	GLSF GSF DU	[1]	2,113	38	118	156	125	53	178
2	Proposed	1500 South Figueroa Street	Apartment Retail	190 12,432	DU GLSF	[1]	1,199	18	67	85	71	40	111
3	Under Construction	454 East Commercial Street	Bus Maintenance Facility	2	Acres	[1]	300	22	8	30	9	1	10
4	Proposed	Tenten Wilshire Expansion 1027 West Wilshire Boulevard	Condominium Retail	356 5,000	DU GLSF	[3]	5,457	113	248	361	286	217	503
5	Proposed	233 West Washington Boulevard	Apartment Retail	160 24,000	DU GLSF	[1]	1,764	25	56	81	89	71	160
6	Proposed	215 West 9th Street	Condominium Retail	210 9,000	DU GLSF	[1]	1,140	14	56	70	64	38	102
7	Proposed	1400 South Figueroa Street	Apartment Retail	106 4,834	DU GLSF	[1]	647	10	38	48	39	22	61
8	Under Construction	Amacon Project 1133 South Hope Street	Apartment Retail	208 5,029	DU GLSF	[1]	1,543	20	74	94	91	50	141
9	Proposed	Magatoys 905 East 2nd Street	Condominium Retail	320 18,712	DU GLSF	[1]	1,207	(6)	70	64	69	23	92
10	Under Construction	Park Fifth 427 West 5th Street, 437 South Hill Street	Apartment Restaurant	600 13,742	DU GSF	[3]	4,707	71	273	344	279	158	437
11	Proposed	1115 South Hill Street	Condominium Restaurant	172 6,850	DU GSF	[1]	543	(45)	40	(5)	50	(7)	43
12	Proposed	1130 West Wilshire Boulevard	Office Day Care	88,224 20	GSF Students	[1]	964	92	12	104	28	61	89

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			High-Turnover Restaurant Quality Restaurant	248 5,375	GSF GSF								
13	Proposed	Embassy Tower 848 South Grand Avenue	Condominium Retail	420 38,500	DU GLSF	[1]	3,882	66	144	210	212	165	377
14	Proposed	826 South Mateo Street	Condominium Retail Restaurant	90 11,000 5,600	DU GLSF GSF	[1]	1,267	11	34	45	62	39	101
15	Proposed	2030 East 7th Street	Office Retail	243,583 40,000	GSF GLSF	[1]	2,306	274	34	308	69	249	318
16	Proposed	The Reef - LA Mart/SOLA Village 1900 South Broadway	Condominium Apartment Hotel Retail Office Gallery/Museum Gym	900 550 210 143,100 180,000 17,600 8,000	DU DU Rooms GLSF GSF GSF GSF	[1]	5,985	390	552	942	637	566	1,203
17	Proposed	Grand Avenue Project 225 South Grand Avenue 100 South Grand Avenue	Condominium Apartment Office Retail	1,432 357 681,000 449,000	DU DU GSF GLSF	[1] [4]	21,631	929	611	1,540	1,067	1,348	2,415
18	Under Construction	Metropolis Mixed-Use 899 South Francisco Street	Hotel Condominium Retail/Restaurant Office	480 836 46,000 988,225	Rooms DU GSF GSF	[3] [5]	8,010	307	318	625	387	512	899
19	Proposed	LA Civic Center Office 150 North Los Angeles Street	Office Retail Child Care	712,500 35,000 2,500	GSF GLSF GSF	[1]	13,534	930	118	1,048	435	942	1,377
20	Proposed	1300 South Hope Street	Apartment Retail	419 42,000	DU GLSF	[1]	4,280	88	105	193	136	102	238
21	Proposed	2130 East Violet Street	Office	94,000	GSF	[1]	1,351	137	30	167	39	122	161

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Retail	7,500	GLSF								
22	Proposed	1329 West 7th Street	Apartment	87	DU	[1]	662	16	37	53	39	22	61
23	Under Construction	Topaz Mixed-Use 534-552 South Main Street 539-547 South Los Angeles Street	Apartment	160	DU	[1]	2,213	52	75	127	87	58	145
			Retail	18,000	GLSF								
			Restaurant Fast-Food Restaurant	3,500 3,500	GSF GSF								
24	Under Construction	840 South Olive Street	Condominium Restaurant Retail	303 9,680 1,500	DU GSF GLSF	[1]	3,071	81	166	247	174	96	270
25	Under Construction	Santa Fe Freight Yard Redevelopment 950 East 3rd Street	Apartment Retail/Restaurant School	635 30,062 532	DU GLSF Students	[1]	6,372	162	177	339	245	213	458
26	Proposed	201 South Broadway	Office/Retail Restaurant	27,675	GSF	[1]	1,638	(40)	(41)	(81)	53	17	70
27	Proposed	The City Market 1057 South San Pedro Street ENV-2012-3003-EIR	Office Retail Cinema Apartment Hotel Condominium	549,141 224,862 744 877 210 68	GSF GLSF Seats DU Rooms DU	[6]	15,890	837	434	1,271	632	957	1,589
28	Under Construction	400 South Broadway	Apartment Retail Bar	450 6,904 5,000	DU GLSF GSF	[3]	3,292	50	187	237	193	112	305
29	Proposed	Camden Arts Mixed-Use 1525 East Industrial Street	Apartment Retail Restaurant Office	328 6,400 5,700 27,300	DU GLSF GSF GSF	[1]	2,288	58	73	131	86	69	155
30	Proposed	920 South Hill Street	Apartment Retail	239 5,400	DU GLSF	[1]	1,476	23	84	107	87	50	137

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
31	Proposed	955 South Broadway	Apartment Retail	163 6,406	DU GLSF	[1]	1,275	21	72	93	74	43	117
32	Under Construction	1212 South Flower Street	Condominium Retail	730 7,873	DU GLSF	[1]	3,956	78	233	311	229	121	350
33	Under Construction	820 South Olive Street 825 South Hill Street	Apartment Retail	589 4,500	DU GLSF	[1]	3,309	63	202	265	195	106	301
34	Proposed	1722 East 16th Street	Restaurant	8,515	GSF	[1]	592	(4)	2	(2)	36	11	47
35	Proposed	601 South Main Street	Condominium Retail	452 25,000	DU GLSF	[1]	2,686	36	144	180	152	87	239
36	Proposed	2051 East 7th Street	Apartment Retail Restaurant	320 15,000 5,000	DU GLSF GSF	[3]	2,310	17	127	144	145	64	209
37	Under Construction	Herald Examiner 1111 South Broadway & 156 West 11th Street & 1201 South Main Street	Apartment Retail Office	391 49,000 39,725	DU GLSF GSF	[8]	5,198	144	176	320	258	274	532
38	Under Construction	South Park Site 1 1120 South Grand Avenue	Apartment Retail	666 20,690	DU GLSF	[1]	2,730	42	127	169	136	93	229
39	Under Construction	1247 South Grand Avenue	Apartment Retail	115 4,610	DU GLSF	[9]	763	10	41	51	42	25	67
40	Proposed	1400 South Flower Street	Apartment Retail	147 6,921	DU GLSF	[1]	798	(1)	49	48	51	16	67
41	Proposed	Variety Arts Mixed-Use 940 South Figueroa Street	Theater Restaurant Bar	1,942 10,056 5,119	Seats GSF GSF	[1]	2,237	5	4	9	99	35	134
42	Under Construction	La Plaza Cultura Village 527 North Spring Street	Apartment Retail Specialty Retail Restaurant	345 23,000 21,000 11,000	DU GLSF GLSF GSF	[1]	3,585	49	118	167	189	131	320
43	Proposed	1036 South Grand	Restaurant	7,149	GSF	[1]	492	2	3	5	27	14	41

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		Avenue											
44	Proposed	Coca Cola 963 East 4th Street	Office Retail Restaurant	78,600 25,000 20,000	GSF GLSF GSF	[1]	2,512	106	22	128	113	138	251
45	Proposed	1248 South Figueroa Street	Hotel Restaurant	1,162 13,145	Rooms GSF	[3]	5,720	192	125	317	203	212	415
46	Proposed	459 South Hartford Avenue	Apartment	101	DU	[1]	361	15	15	30	22	22	44
47	Proposed	Arts District Center 1129 East 5th Street	Retail Restaurant Hotel Apartment Art School/Convention Hall Art Gallery/Creative Office	23,000 28,400 149 228 15,700 39,860	GLSF GSF Rooms DU GSF GSF	[1]	4,674	130	140	270	157	69	226
48	Proposed	1800 East 7th Street	Apartment Restaurant Retail	122 4,605 3,245	DU GSF GLSF	[3]	1,536	42	74	116	74	46	120
49	Proposed	1150 West Wilshire Boulevard	Apartment Restaurant	80 4,589	DU GSF	[1]	511	(22)	26	4	39	(5)	34
50	Under Construction	737 South Spring Street	Apartment Pharmacy/Drug Store	320 25,000	DU GSF	[1]	3,942	72	141	213	167	116	283
51	Proposed	520 South Mateo Street CPC-2016-3853	Apartment Office Retail Restaurant	600 30,000 15,000 15,000	DU GSF GLSF GSF	[3]	4,995	157	220	377	274	223	497
52	Proposed	1218 West Ingraham Street	Apartment	80	DU	[1]	532	8	33	41	33	17	50
53	Proposed	Palmetto & Mateo 555 South Mateo Street	Retail	153,000	GLSF	[1]	4,300	5	30	35	220	205	425

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
54	Under Construction	732 South Spring Street	Apartment Pharmacy/Drug Store	400 15,000	DU GSF	[1]	3,359	59	152	211	164	104	268
55	Proposed	340 South Hill Street	Apartment Restaurant	428 2,894	DU GSF	[3]	2,253	36	129	165	133	75	208
56	Proposed	1145 West 7th Street ENV-2015-2800-MND	Condominium Retail	241 7,291	DU GLSF	[1]	1,084	4	66	70	67	35	102
57	Proposed	540 South Santa Fe Avenue	Office	89,825	GSF	[1]	726	90	12	102	17	81	98
58	Proposed	360 South Alameda Street	Apartment Office Restaurant	55 6,300 2,500	DU GSF GSF	[1]	670	25	33	58	35	26	61
59	Proposed	118 South Astronaut Ellison S Onizuka Street	Apartment	77	DU	[1]	97	(1)	20	19	19	6	25
60	Proposed	222 West 2nd Street	Office Apartment Retail	534,044 107 7,200	GSF DU GLSF	[10]	4,006	467	93	560	118	423	541
61	Proposed	Soho House 1000 South Santa Fe Avenue	Restaurant/Bar Private Club	8,447 48	GSF Rooms	[3]	966	36	38	74	49	20	69
62	Proposed	700 West Cesar Chavez Avenue	Apartment Retail	299 8,000	DU GLSF	[1]	1,511	7	89	96	99	54	153
63	Proposed	Clinic at 7th & Wall 649 South Wall Street	Medical Office Assisted Living	66 55	Empl. Beds	[1]	104	24	5	29	3	24	27
64	Proposed	Metro Emergency Security Operations Center 410 North Center Street	Office	110,000	GSF	[1]	1,165	87	0	87	0	79	79
65	Proposed	500 South Mateo Street	Restaurant	12,882	GSF	[1]	1,052	48	41	89	50	31	81
66	Proposed	Medallion Phase 2 300 South Main Street	Apartment Retail/Restaurant	471 32,970	DU GLSF	[1]	4,691	143	243	386	257	153	410
67	Proposed	Alexan South Broadway	Apartment	300	DU	[1]	1,998	29	108	137	117	67	184

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		850 South Hill Street	Retail/Restaurant	7,000	GLSF								
68	Proposed	Olympic & Hill Mixed-Use 1030 South Hill Street	Apartment Retail Restaurant	700 7,000 8,000	DU GLSF GSF	[1]	3,392	49	193	242	181	104	285
69	Proposed	Alameda Hotel 400 South Alameda Street	Hotel Restaurant Retail	66 2,130 840	Rooms GSF GLSF	[1]	512	20	18	38	23	14	37
70	Proposed	Apex II 700 West 9th Street	Apartment Retail	341 11,687	DU GLSF	[3]	2,624	37	146	183	143	95	238
71	Proposed	649 South Olive Street	Hotel	241	Rooms	[1]	1,674	65	44	109	63	60	123
72	Proposed	Sapphire Mixed-Use 1111 West 6th Street	Apartment Retail	362 25,805	DU GLSF	[1]	587	(71)	117	46	104	(51)	53
73	Proposed	Grand Residences 1233 South Grand Avenue	Condominium Restaurant	161 3,000	DU GSF	[11]	1,116	23	62	85	62	33	95
74	Proposed	675 South Bixel Street	Hotel Apartment Retail	126 422 4,874	Rooms DU GLSF	[1]	3,461	74	173	247	184	116	300
75	Proposed	740 South Hartford Avenue	Apartment	80	DU	[1]	479	7	30	37	29	15	44
76	Proposed	Lifan Tower 1235 West 7th Street	Condominium Retail	304 5,960	DU GLSF	[1]	1,959	30	108	138	114	66	180
77	Proposed	940 South Hill Street	Apartment Retail	232 14,000	DU GLSF	[1]	1,881	20	80	100	115	53	168
78	Proposed	361 South Spring Street	Hotel Meeting Rooms	315 2,000	Rooms GSF	[1]	2,273	91	59	150	84	85	169
79	Proposed	1340 South Olive Street	Apartment Retail Restaurant	156 5,000 10,000	DU GLSF GSF	[1]	1,700	51	82	133	89	57	146
80	Proposed	1334 South Flower Street	Apartment Retail/Restaurant	146 6,270	DU GLSF	[1]	796	(1)	49	48	51	16	67

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
81	Proposed	929 East 2nd Street	Retail Other	37,974 71,078	GLSF GSF	[3]	2,153	68	12	80	105	96	201
82	Proposed	633 South Spring Street	Hotel Restaurant Bar	176 8,430 5,290	Rooms GSF GSF	[1]	2,045	83	33	116	97	99	196
83	Proposed	Luxe Hotel 1020 South Figueroa Street	Hotel Condominium Retail	300 435 58,959	Rooms DU GLSF	[1]	6,583	204	274	478	312	27	339
84	Under Construction	1200 South Figueroa Street	Residential Restaurant Retail	648 20,000 28,000	DU GSF GLSF	[12]	5,717	79	158	237	170	113	283
85	Proposed	701 South Hill Street	Apartment Retail	124 8,500	DU GLSF	[13] [14]	825 363	13 5	50 3	63 8	50 15	27 17	77 32
86	Proposed	525 South Spring Street	Apartment Retail	360 9,400	DU GLSF	[13] [14]	2,394 401	37 6	147 3	184 9	145 17	78 18	223 35
87	Proposed	Case Hotel 1106 South Broadway	Hotel	151	Rooms	[15]	1,234	47	33	80	46	45	91
88	Proposed	Freehand Hotel 416 West 8th Street	Hotel	200	Rooms	[15]	1,634	63	43	106	61	59	120
89	Proposed	656 South Stanford Avenue	Apartment	82	DU	[1]	1,463	8	34	42	33	18	51
90	Proposed	Olympic Tower 815 West Olympic Boulevard	Hotel Retail Condominiums Office Conference Center	373 65,074 374 33,498 10,801	Rooms GLSF DU GSF GSF	[16]	4,423	166	170	336	189	185	374
91	Proposed	LA Gateway Project 1025 Olympic Boulevard ENV-2016-4889-EIR	Apartment Restaurant Retail	1,367 20,000 20,000	DU GSF GLSF	[3]	5,216	86	297	383	283	115	398
92	Under Construction	Oceanwide Plaza 1101 South Flower Street	Condominiums Hotel	504 183	DU Rooms	[17] [18] [15] [18]	2,928 1,495	38 57	184 40	222 97	176 56	86 54	262 110

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Retail	120,583	GLSF	[14] [18]	5,149	72	44	116	215	232	447
			Restaurant	46,000	GSF	[19] [18]	5,849	273	224	497	272	181	453
93	Proposed	Los Angeles Sports and Entertainment District Figueroa Street & 11th Street DIR-2005-7453-SPP-M3	Office	601,800	GSF	[4] [18] [20]	5,136	708	96	804	129	631	760
			Convention Center	250,000	GSF	[4] [18]	2,050	Nom.	Nom.	Nom.	51	154	205
94	Proposed	708 North Hill Street	Apartment	162	DU	[1]	980	16	57	73	57	33	90
			Retail	5,000	GLSF								
95	Proposed	130 South Beaudry Avenue	Apartment	230	DU	[1]	1,159	8	76	84	76	29	105
96	Proposed	Urban View Lots 495 South Hartford Avenue	Apartment	218	DU	[1]	1,033	16	63	79	62	34	96
97	Proposed	8th & Figueroa Mixed-Use 744 South Figueroa Street	Apartment	438	DU	[1]	2,972	38	148	186	176	94	270
			Retail	7,500	GLSF								
98	Proposed	433 South Main Street	Condominium Mixed-Use	196 6,200	DU GSF	[1]	1,450	32	72	104	61	37	98
99	Proposed	Downtown LA Hotel 926 West James M. Woods Boulevard	Hotel	247	Rooms	[1]	1,562	59	42	101	59	56	115
100	Proposed	JMF Tower 333 West 5th Street	Condominiums Hotel Retail	100 200 27,500	DU Rooms GLSF	[1]	3,358	64	72	136	201	129	330
101	Proposed	Times Mirror Square 202 West 1st Street	Apartments Office Supermarket Restaurant	1,127 285,088 50,000 75,589	DU GSF GSF GSF	[21]	8,535	94	341	435	294	38	332
102	Under Construction	888 South Hope Street	Apartments	526	DU	[13]	3,498	54	214	268	212	114	326
103	Proposed	2117 East Violet Street CPC-2017-437-GPA	Apartments	509	DU	[13]	3,385	52	208	260	205	111	316
			Retail	288,230	GLSF	[14]	12,307	172	105	277	513	556	1,069

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
104	Proposed	Ferrante 1000 West Temple Street	Apartments	1,500	DU	[13]	9,975	153	612	765	605	325	930
			Retail	30,000	GLSF	[14]	1,281	18	11	29	53	58	111
105	Proposed	6AM Project	Apartments	1,305	DU	[1]	14,258	437	585	1,022	710	642	1,352
		640 South Alameda Street, 1206 East 6th Street ENV-2016-3758-EIR	Condominiums	431	DU								
			Hotel	412	Rooms								
			Office	253,514	GSF								
			Retail	127,609	GLSF								
			School	29,316	GSF								
			Art Space	22,429	GSF								
106	Proposed	1300 South Figueroa Street CPC-2017-746-GPA	Hotel	1,024	Rooms	[15]	9,134	398	288	686	351	366	717
107	Proposed	Budokan of Los Angeles 237-249 South Los Angeles Street	Sports Center	63,000	GSF	[1]	1,869	79	50	129	161	98	259
108	Proposed	King's Arch 537 South Broadway	Office	45,000	GSF	[23]	496	62	8	70	11	56	67
109	Proposed	Title Insurance Building 433 South Spring Street	Office	320,000	GSF	[23]	3,178	427	58	485	74	363	437
110	Proposed	Subway Terminal Retail 417 South Hill Street	Retail/Office	130,000	GLSF	[14]	5,551	78	47	125	231	251	482
111	Proposed	401 South Hewitt Street COC-2017-469-GPA	Office	255,500	GSF	[1]	3,493	365	76	441	100	324	424
			Retail	4,970	GLSF								
			Restaurant	9,940	GSF								
112	Proposed	333 South Alameda Street CPC-2017-552-GPA	Apartments	994	DU	[3]	8,445	134	260	394	390	329	719
			Retail	99,300	GLSF								
113	Proposed	1000 South Hill Street ENV-2016-4711-EAF	Apartments	498	DU	[13]	3,312	51	203	254	201	108	309
			Retail	8,707	GLSF	[14]	372	5	3	8	15	17	32
114	Proposed	1018 West Ingraham Street ENV-2017-979-EAF	Apartments	37	DU	[1]	327	5	16	21	18	12	30
			Retail	1,890	GLSF								
115	Proposed	1100 East 5th Street	Apartment	220	DU	[3]	2,583	79	119	198	133	74	207

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		ENV-2016-3727-EIR, VTT-74549	Office	20,021	GSF								
			Restaurant	19,609	GSF								
			Retail	9,250	GLSF								
116	Proposed	1100 South Main Street ENV-2016-3825-EAF	Apartments	379	DU	[3]	385	9	103	112	78	14	92
			Retail	25,810	GLSF								
117	Proposed	220 North Center Street 2017-CEN-46412	Apartment	430	DU	[3]	2,166	33	119	152	121	79	200
			Retail	8,742	GLSF								
118	Proposed	1219 South Hope Street ENV-2017-1701-EAF	Hotel	75	Rooms	[1]	613	24	16	40	23	22	45
			Restaurant	7,700	GSF								
119	Proposed	1307 West 7th Street DIR-2015-3777-SPP-DB-1A	Apartments	76	DU	[13]	505	8	31	39	31	16	47
			Retail	6,035	GLSF	[14]	258	4	2	6	11	11	22
120	Proposed	1322 West Maryland Street DIR-2016-3116-DB-SPP	Apartments	47	DU	[13]	313	5	19	24	19	10	29
			Retail	760	GLSF	[14]	32	1	0	1	1	2	3
121	Proposed	1323 South Grand Avenue	Apartments	284	DU	[1]	2,158	33	118	151	125	74	199
			Retail/Restaurant	6,300	GLSF								
122	Proposed	601 South Central Avenue 930 East 6th Street	Apartments	236	DU	[1]	1,074	17	79	96	70	32	102
			Retail	12,000	GLSF								
123	Proposed	640 South Santa Fe Avenue	Office	91,185	GSF	[1]	1,330	90	8	98	43	114	157
			Retail/Restaurant	15,980	GLSF								
124	Proposed	641 South Imperial Street ENV-2017-740-EAF	Apartments	140	DU	[3] [13]	931	14	57	71	57	30	87
			Office	14,749	GLSF	[3] [23]	163	20	3	23	4	18	22
125	Proposed	643 North Spring Street	Apartments	281	DU	[1]	2,723	61	122	183	138	91	229
			Hotel	142	Rooms								
			Retail	17,003	GLSF								
			Restaurant	2,532	GSF								
126	Proposed	668 South Alameda Street	Apartment	475	DU	[3]	4,002	107	182	289	216	145	361

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		VTT-74537	Office	43,000	GSF								
			Retail	9,000	GLSF								
			Supermarket	15,000	GSF								
			Restaurant	17,000	GSF								
127	Proposed	676 South Mateo Street VTT-74550	Apartment	185	DU	[1]	1,990	50	95	145	106	51	157
			Mixed-Use	27,280	GLSF								
128	Proposed	755 South Los Angeles Street ENV-2016-4963-EAF	Office	60,243	GSF	[3]	2,482	110	57	167	105	100	205
			Retail	16,694	GLSF								
			Restaurant	26,959	GSF								
129	Proposed	940 East 4th Street ENV-2017-611-EAF	Apartment	93	DU	[3]	788	14	37	51	44	31	75
			Retail	14,248	GLSF								
			Office	6,000	GSF								
130	Proposed	1410 South Flower Street ENV-2016-2477-MND	Apartments	152	DU	[13]	1,011	16	62	78	61	33	94
			Retail	1,184	GLSF	[14]	51	1	0	1	2	2	4
131	Proposed	845 South Olive Street ENV-2016-4864-MND	Apartment	208	DU	[3]	1,305	25	76	101	77	42	119
			Retail	810	GLSF								
			Restaurant	1,620	GSF								
132	Proposed	330 South Alameda Street ENV-2016-3335-EIR	Apartment	186	DU	[3]	1,662	36	76	112	91	65	156
			Office	10,415	GSF								
			Retail	11,925	GLSF								
133	Proposed	527 South Colyton Street ENV-2016-3400-EIR	Apartments	310	DU	[1]	2,095	36	116	152	121	74	195
			Retail	11,375	GLSF								
			Office	11,736	GSF								
134	Proposed	Fashion District Residences 212-230 East 7th Street, 701-739 South Maple Avenue ENV-2016-3685-MND	Apartments	452	DU	[1]	3,199	67	179	246	185	105	290
			Retail	6,802	GLSF								
			Restaurant	6,802	GSF								
135	Proposed	755 South Wall Street ENV-2016-3991-EIR	Apartment	323	DU	[3]	2,499	122	79	201	164	141	305
			Retail	4,400	GLSF								
			Event Space	125	Persons								

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Office	53,200	GSF								
			Restaurant	4,420	GSF								
136	Proposed	1101 East 5th Street, 445-457 South Colyton Street ENV-2016-4476-EIR	Live/Work	129	DU	[3]	4,674	130	140	270	157	69	226
			Retail	26,979	GLSF								
			Restaurant	31,719	GSF								
			Hotel	113	Rooms								
			Art Uses	13,771	GSF								
137	Proposed	1045 South Olive Street ENV-2017-3264-EIR	Apartments	794	DU	[1]	2,227	39	157	196	138	62	200
			Retail	12,504	GLSF								
138	Proposed	Figueroa Centre 913 South Figueroa Street ENV-2017-174-EIR	Hotel	220	Rooms	[3]	7,145	143	162	305	315	290	605
			Condominiums	200	DU								
			Retail	94,080	GLSF								
139	Proposed	8th, Grand & Hope Tower 754 South Hope Street	Apartments	401	DU	[1]	2,315	35	137	172	137	78	215
			Retail	19,909	GLSF								
140	Proposed	1340 South Hill Street ENV-2017-1213-EAF	Apartments	233	DU	[3]	1,755	11	103	114	108	30	138
141	Proposed	670 South Mesquite Street ENV-2017-249-EIR	Apartments	308	DU	[1]	22,845	1,258	321	1,579	640	1,195	1,835
			Hotel	236	Rooms								
			Office	944,055	GSF								
			Retail	79,240	GLSF								
			Restaurant	89,576	GSF								
			Event Space	93,617	GSF								
			Gym	62,148	GSF								
			Grocery	56,912	GSF								
142	Under Construction	Alameda Square 777 South Alameda Street	Restaurant	117,400	GSF	[1]	916	(134)	(172)	(306)	(157)	35	(122)
			Retail	66,200	GLSF								
143	Proposed	1600 South Figueroa Street	Apartments	336	DU	[13]	2,234	34	137	171	135	73	208

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		CPC-2017-400-GPA	Hotel	250	Rooms	[15]	2,230	97	71	168	86	89	175
144	Proposed	2159 East Bay Street CPC-2017-624-VZC	Office Retail	203,670 18,330	GSF GLSF	[1]	2,029	194	30	224	57	192	249
145	Proposed	2110 Bay Street 2016-CEN-44566	Apartment Affordable Housing Office Retail	99 11 113,350 43,657	DU DU GSF GLSF	[3]	2,394	180	63	243	89	192	281
146	Proposed	215 West 14th Street	Apartment Retail	154 10,700	DU GLSF	[3]	1,481	22	67	89	81	54	135
147	Proposed	1745 East 7th Street	Apartment Retail	57 6,000	DU GLSF	[3]	635	10	25	35	34	23	57
148	Under Construction	354 South Spring Street	Apartment Restaurant	212 15,280	DU GSF	[13]	1,410	22	86	108	85	46	131
149	Proposed	Alameda District Plan	Residential Office Retail Hotel Restaurant	22 7,443,200 645,000 750 20,000	DU GSF GLSF Rooms GSF	[3]	25,312	862	527	1,389	734	1,042	1,776
150	Proposed	775 South Figueroa Street 945 West 8th Street	Apartment Retail	781 6,700	DU GLSF	[1]	2,869	63	146	209	144	91	235
151	Proposed	655 South San Pedro 513 East 7th Street DIR-2017-2333-SPR	Apartment	81	DU	[3]	539	8	33	41	33	17	50
152	Proposed	900 North Alameda Street 2017-CEN-46271	Data Center	179,900	GSF	[3]	178	8	8	16	3	13	16
153	Proposed	1005 South Mateo Street 2007-CEN-4582	Industrial Park	94,849	GSF	[3]	426	40	9	49	10	39	49
154	Proposed	1000-1024 South Mateo Street	Apartment Office Restaurant Retail	104 101,983 16,279 5,830	DU GSF GSF GLSF	[3]	2,238	153	83	236	90	131	221

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Arts & Production	5,519	GSF								
155	Proposed	LA County Consolidated Correctional Facility 441 East Baughet Street	Jail	3,885	Beds	[1]	242	0	9	9	0	9	9
156	Proposed	2143 East Violet Street	Apartment Office Retail	320 224,292 46,670	DU GSF GLSF	[1]	4,477	329	122	451	130	330	460
157	Proposed	806 East 3rd Street	Restaurant	18,327	GSF	[1]	253	1	(1)	0	13	7	20
158	Proposed	Olympia Mixed-Use 1001 West Olympic Boulevard	Apartment Restaurant Retail Hotel	879 20,000 20,000 1,000	DU GSF GLSF Rooms	[1]	10,418	320	388	708	455	309	764
159	Proposed	609 East 5th Street	Apartment	151	DU	[1]	1,004	15	62	77	61	33	94
160	Proposed	810 East 3rd Street	Apartment Restaurant Retail	4 3,541 6,171	DU GSF GLSF	[1]	1,487	37	32	69	87	48	135
161	Proposed	508 East 4th Street	Apartment	41	DU	[1]	167	8	12	20	8	6	14

[1] Source: City of Los Angeles Department of Transportation (LADOT) and Department of City Planning (LADCP), except as noted below. The peak hour traffic volumes were forecast based on trip data provided by LADOT and by applying trip rates as provided in the ITE "Trip Generation Manual," 9th Edition, 2012.

[2] Trips are one-way traffic movements, entering or leaving.

[3] Project description and trip generation forecasts obtained from third party research.

[4] Description listed constitutes the remaining allowable development under this project.

[5] Source: "Metropolis Master Plan Project – Traffic Analysis Update Phase 2" from Tomas Carranza, Senior Transportation Engineer, to Blake Lamb, City Planner, May 9, 2014.

[6] Source: "Traffic Assessment for the Proposed Development Project Located at 1057 South San Pedro Street," from Tomas Carranza, Senior Transportation Engineer, to Karen Hoo, City Planner, November 6, 2013.

[7] Daily trip volumes are not provided. PM peak hour volume was estimated to represent 10% of the daily totals.

[8] Source: "Updated Traffic Assessment for the South Park Residential Sites and Herald Examiner Building Renovation Project", from Tomas Carranza, Senior Transportation Engineer, to Karen Hoo, City Planner, January 24, 2014.

[9] Source: "Grand Avenue/Pico Boulevard Project Traffic Impact Analysis", prepared by Kunzman Associates, Inc., January 27, 2014.

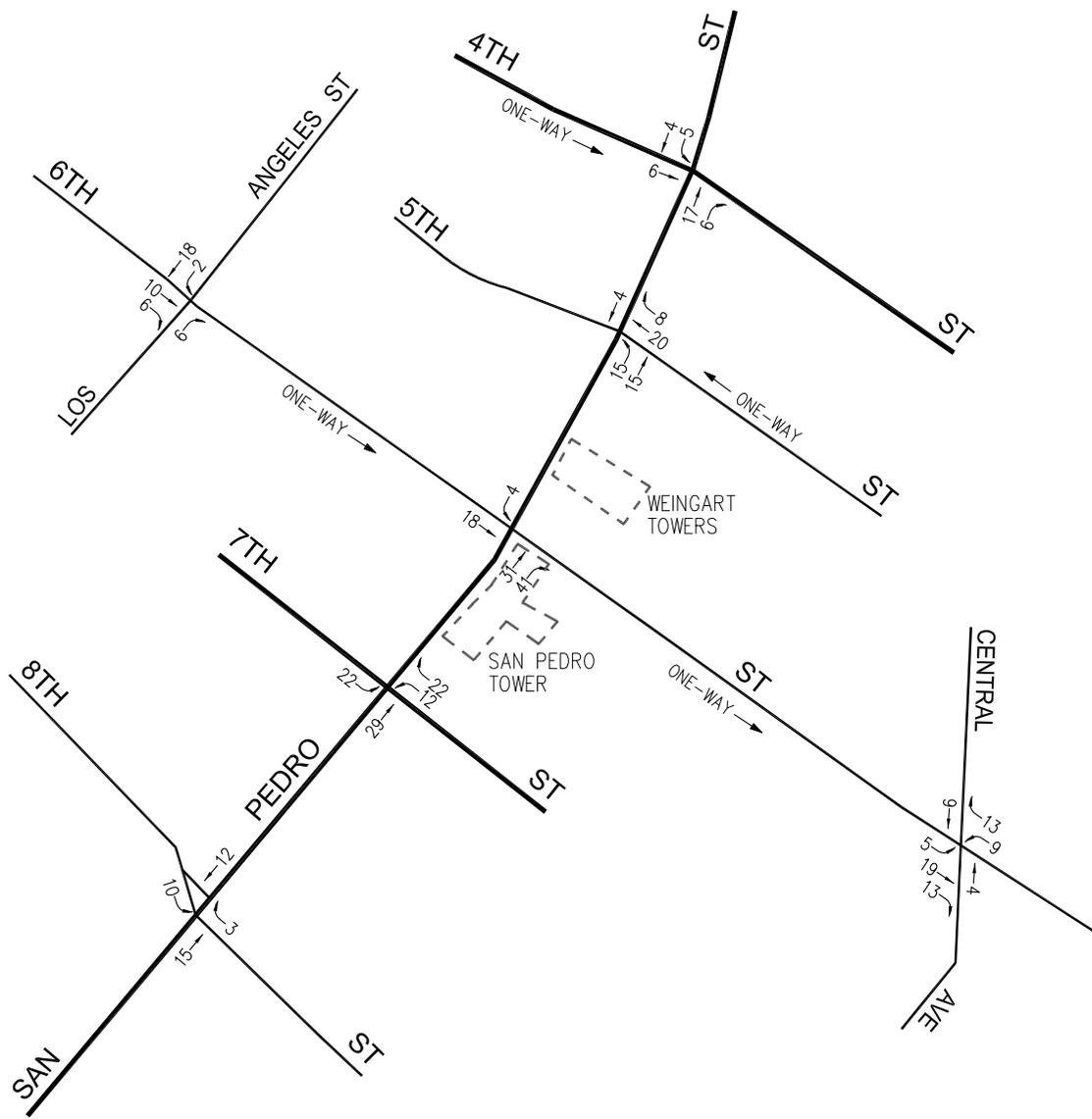
[10] Source: "222 West 2nd Project Traffic Study MOU," prepared by LLG Engineers, Dated January 18, 2016.

[11] Source: "Grand Residences Draft Traffic Impact Study", prepared by LLG Engineers, February 4, 2016.

[12] Sources: "Los Angeles Sports and Entertainment District Specific Plan Determination and Findings", Michael J. LoGrande, Director of Planning, November 12, 2014; "L.A. Entertainment District EIR Traffic Study", prepared by The Mobility Group with Kaku Associates, January 2001. Daily and AM Peak Hour trips were forecast using the following ITE trip generation average rates; Land Use Code 222 (High-Rise Apartment), Land Use Code 931 (Quality Restaurant), and Land Use Code 820 (Shopping Center).

**Table 6-68
Related Projects List and Trip Generation [1]**

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data		Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size			In	Out	Total	In	Out	Total
<p>[13] ITE Land Use Code 220 (Apartment) trip generation average rates. [14] ITE Land Use Code 820 (Shopping Center) trip generation average rates. [15] ITE Land Use Code 310 (Hotel) trip generation average rates. [16] Source: "Olympic Tower Project Traffic Impact Study", prepared by LLG Engineers, October 27, 2016. [17] ITE Land use Code 232 (High-Rise Condo/Townhouse) trip generation rates. [18] Source: "Los Angeles Sports and Entertainment District Specific Plan", DIR-2005-7453-SPP-M3, January 2015. [19] ITE Land Use Code 932 (High-turnover [Sit-Down] Restaurant) trip generation average rates. [20] ITE Land Use Code 710 (General Office Building) trip generation equation rates. [21] Source: "Times Mirror Square", LADOT Transportation Impact Study Memorandum of Understanding, dated March 30, 2017. [22] ITE Land Use Code 495 (Recreational Community Center) trip generation average rates. [23] ITE Land Use Code 710 (General Office Building) trip generation average rates.</p> <p>Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.</p>												

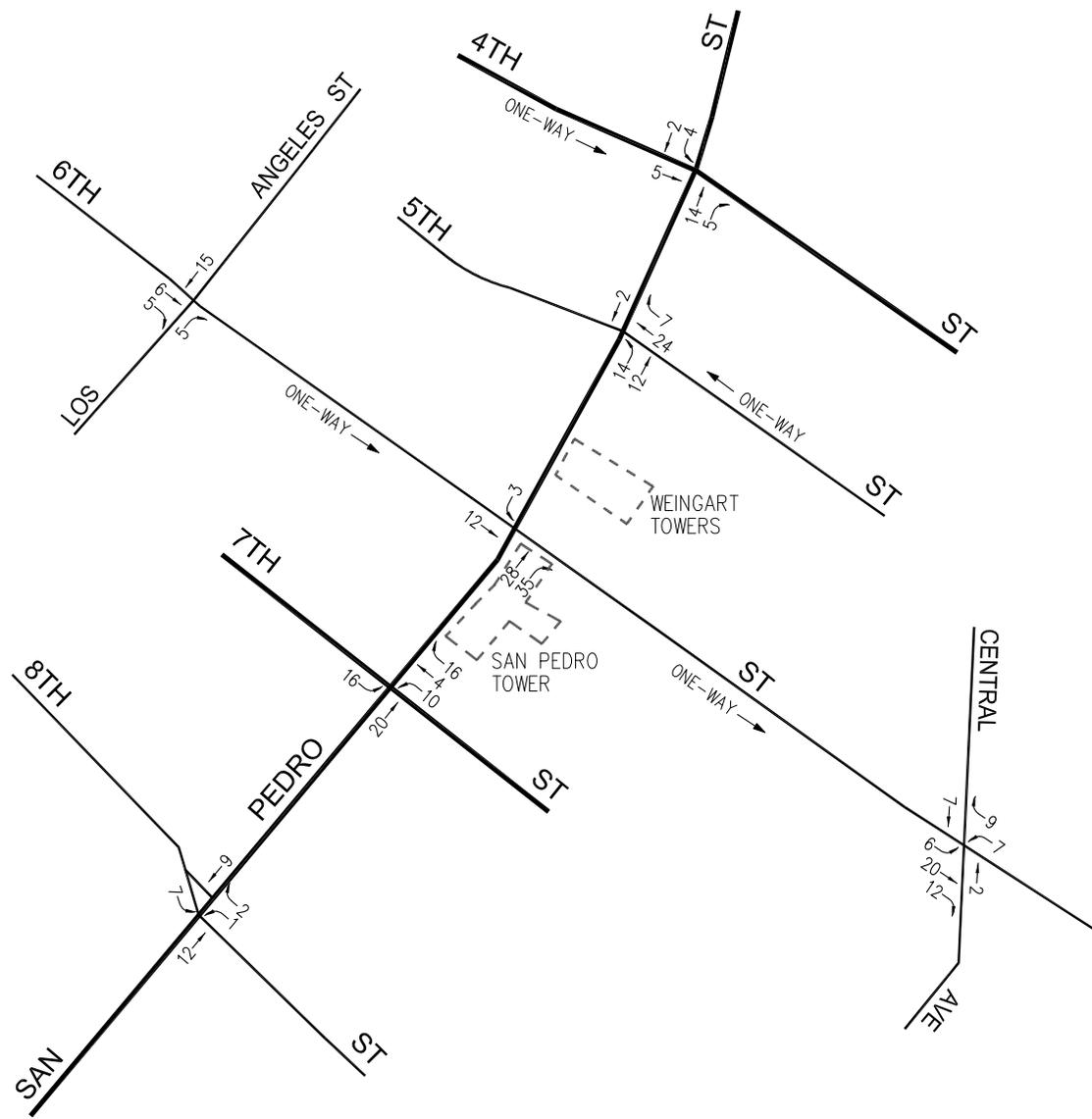


[- - -] PROJECT SITES



Figure 6-11
Project Traffic Volumes
Weekday AM Peak Hour

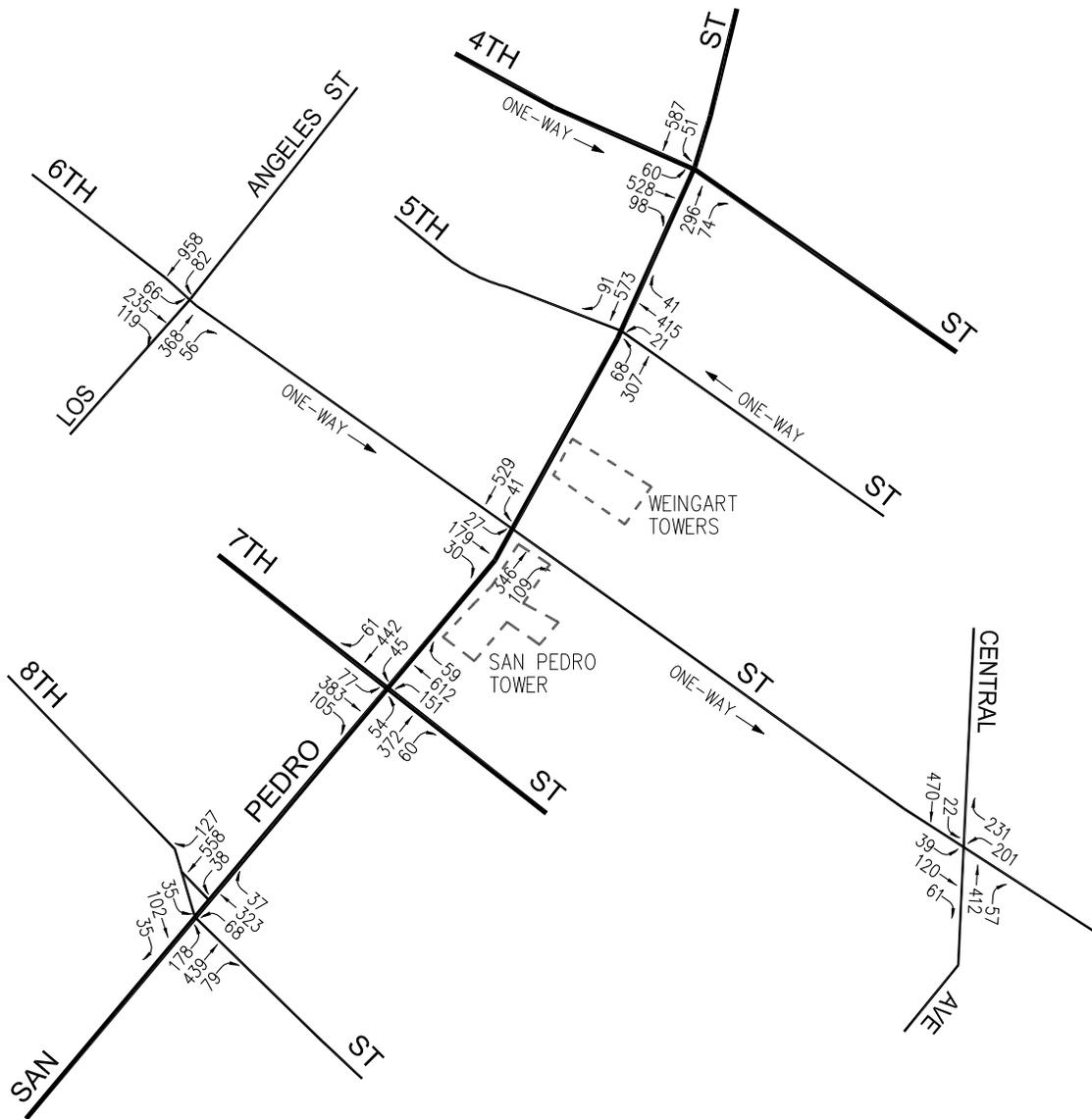
Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES



Figure 6-12
Project Traffic Volumes
Weekday PM Peak Hour

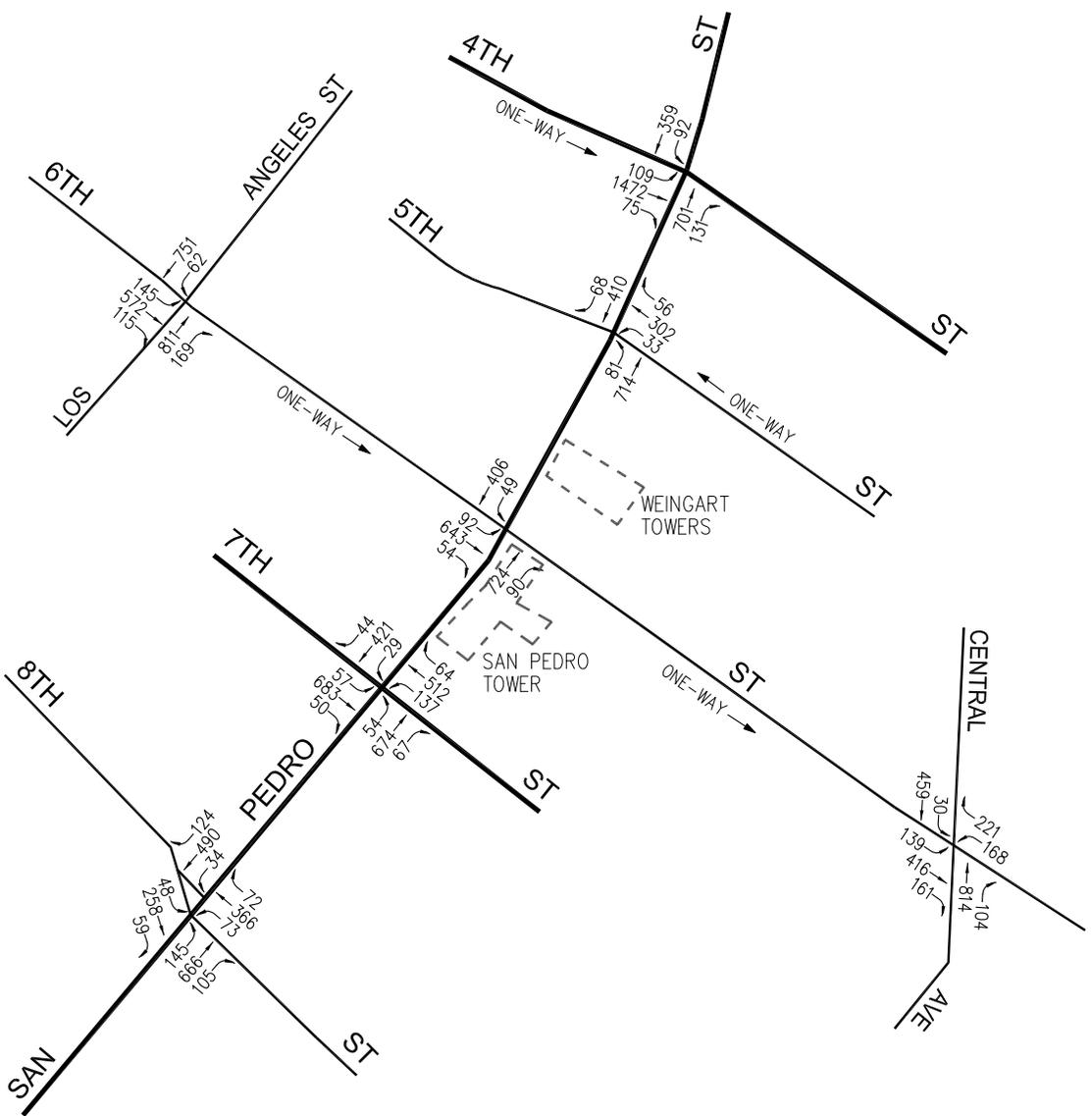


[- - -] PROJECT SITES



Figure 6-13
Existing With Project Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES



Figure I -14
Existing With Project Traffic Volumes
Weekday PM Peak Hour

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the ITE Trip Generation Manual or were obtained from other traffic studies recently approved by the City. The related projects' respective traffic generation for the weekday AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized on Table 6-68. The related projects traffic volumes were distributed and assigned to the street system based on the location of the related projects in relation to the study intersections, their proximity to major traffic corridors, proposed land uses, nearby population and employment centers, etc. The distribution of the related projects traffic volumes to the study intersections during the weekday AM and PM peak hours are displayed on Figures 6-15 and 6-16, respectively.

Downtown Transit/Infrastructure Projects

Several transit and/or infrastructure projects are proposed or under construction within the greater Downtown Los Angeles area. While the projects discussed below and others like them could be expected to result in greater trip reductions than what occur today, no trip reductions have been assumed in this traffic analysis for existing uses so as to provide a conservative review of potential traffic impacts. Some of the relevant projects are as follows:

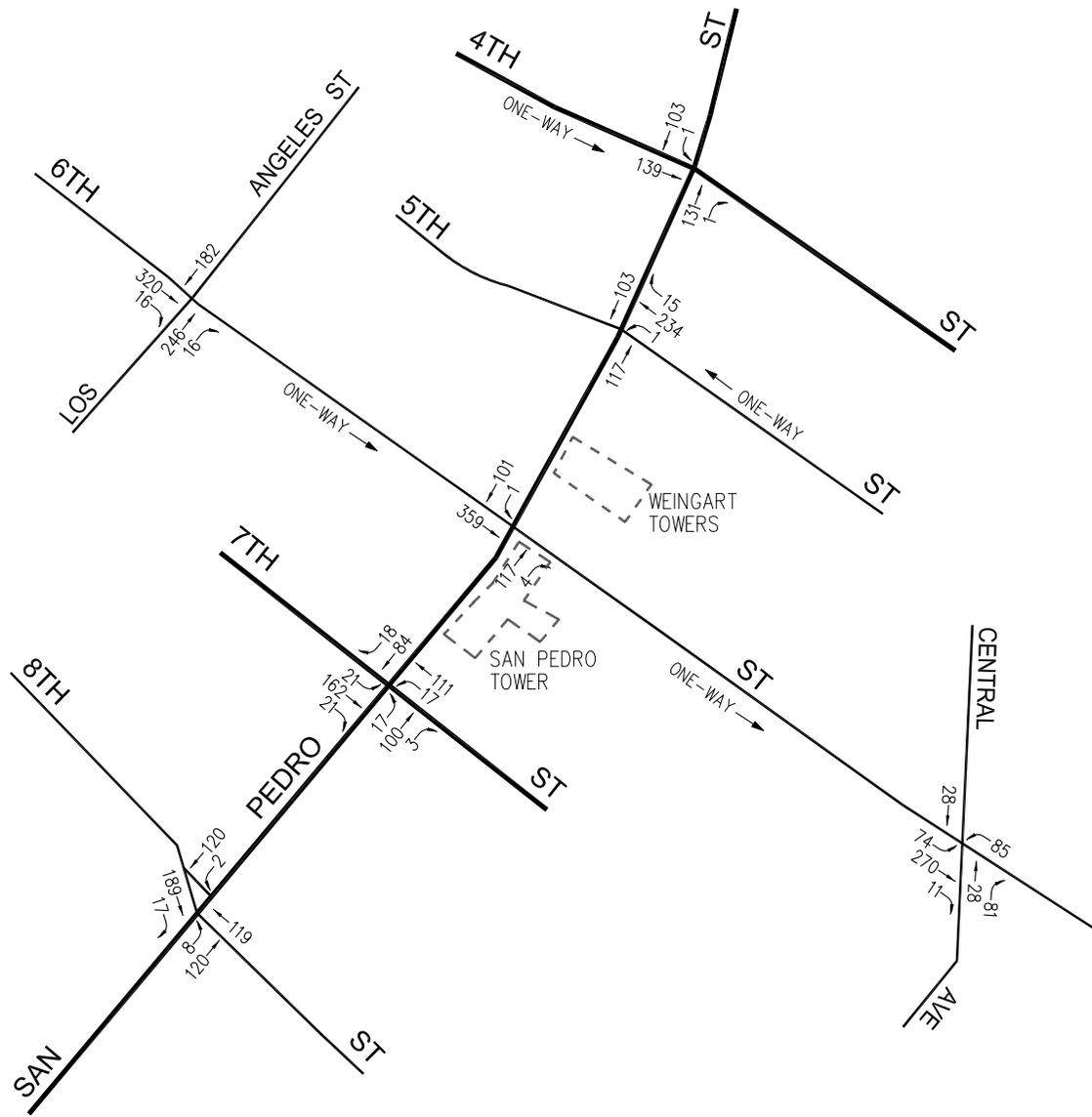
Regional Connector Transit Project

As summarized on the Metro website, the Regional Connector project will extend from Metro's Little Tokyo/Arts District Station to the 7th Street/Metro Center in Downtown Los Angeles. This will allow transit passengers to access the Gold, Blue, Expo, Red, and Purple lines. The addition will extend 1.9 miles and will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, and Flower Street, as well as the Financial District.

This new extension will provide a one-seat ride for travel across Los Angeles County by allowing passengers to travel between Azusa and Long Beach and between East Los Angeles and Santa Monica without having to transfer lines. The forecast opening year of the Regional Connector Transit project is currently 2021.

Downtown Los Angeles Historic Streetcar Project

The restoration of the Historic Streetcar Service in Downtown Los Angeles is expected to revive a service that previously spanned over 600 miles of the Los Angeles area during the first half of the 1900's. The approved alignments closely follow the early alignments that traversed the historic Downtown core. The service would increase mobility and improve connectivity by linking residential and employment hubs, shopping districts, civic resources, cultural institutions, landmarks and entertainment venues for those who live, work, and visit Downtown. The Historic Streetcar project is also intended to connect patrons to a regional network of transit options including local and regional bus lines, and Metro Rail lines including the Regional Connector Transit project. Based on information contained in the Historic Streetcar project's Environmental Impact Report (SCH No. 2013011001), which has been certified by the Los Angeles City Council, assuming that the necessary funding is obtained, this project may be completed by 2020.

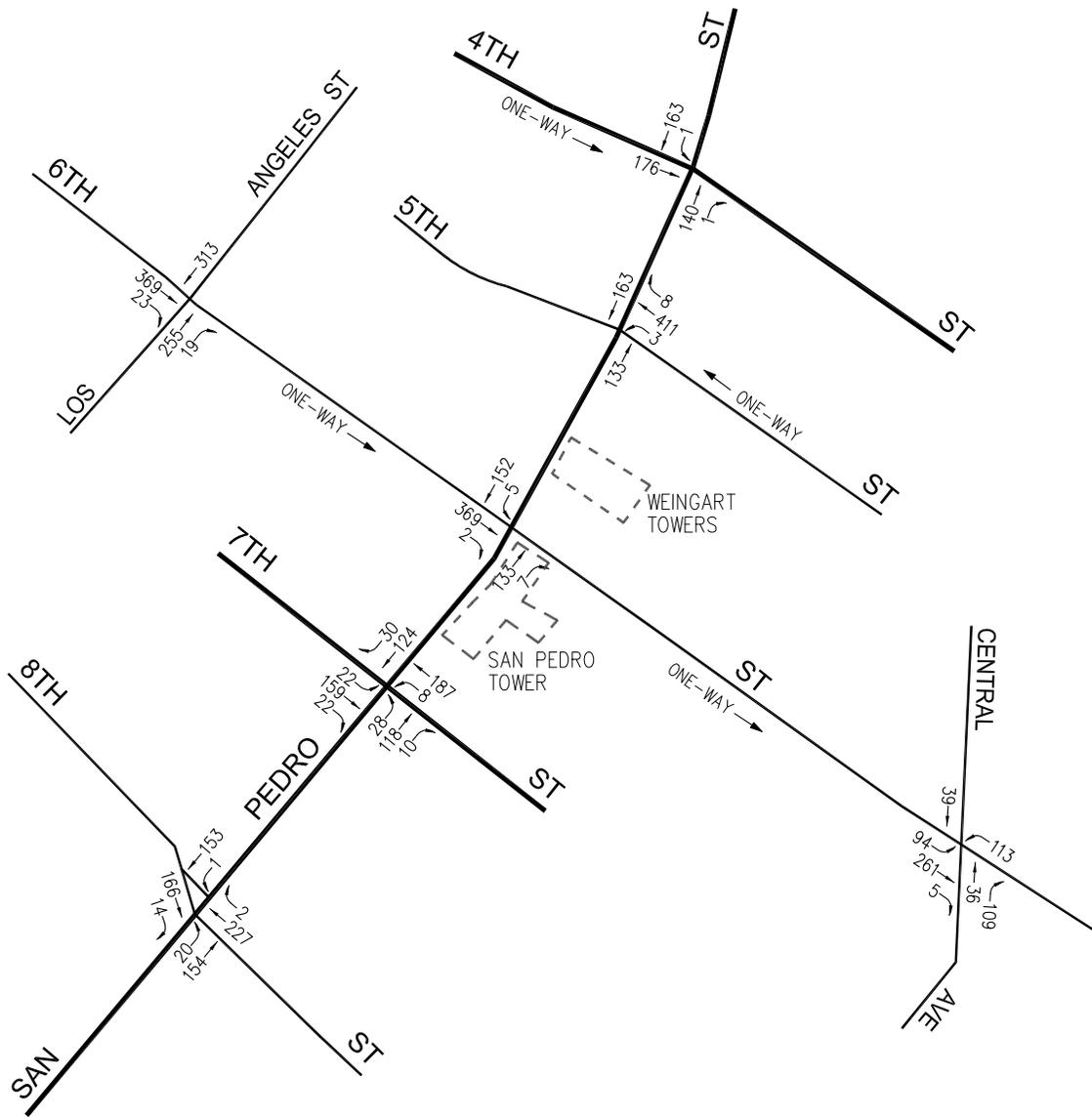


[- - -] PROJECT SITES



Figure 1-15
 Related Projects Traffic Volumes
 Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES



Figure 6-16
Related Projects Traffic Volumes
Weekday PM Peak Hour

Ambient Traffic Growth Factor

Horizon year background traffic growth estimates have been calculated using an ambient traffic growth factor. In addition to accounting for traffic generated by related projects, an ambient traffic growth factor is intended to include unknown related projects in the study area as well as account for typical growth in traffic volumes due to the development of projects outside the study area. Ambient traffic growth in the Downtown Los Angeles area (i.e., included in Regional Statistical Area 23 [RSA 23] that includes Downtown LA), which is presented in the *2010 Congestion Management Program*, indicates existing traffic volumes are expected to increase at an annual rate of approximately 0.20 percent per year between years 2010 and 2025. An annual growth rate of 1.0 percent until the year 2025 (i.e., the anticipated Project build-out year) was selected for this analysis in consultation with LADOT during the scoping process. Thus, application of this 1.0 percent ambient growth factor in addition to the forecast traffic generated by the related projects allows for a conservative forecast of future traffic volumes in the Project study area as incorporation of both (i.e., an ambient traffic growth rate and a detailed list of related projects) overstates potential future traffic volumes. The related projects should already be incorporated as part of the growth rate projection per the adopted, local and regional planning documents (i.e., which account for the future population, housing, and employment [socio-economic data] projections).

Future (2025) Without Project

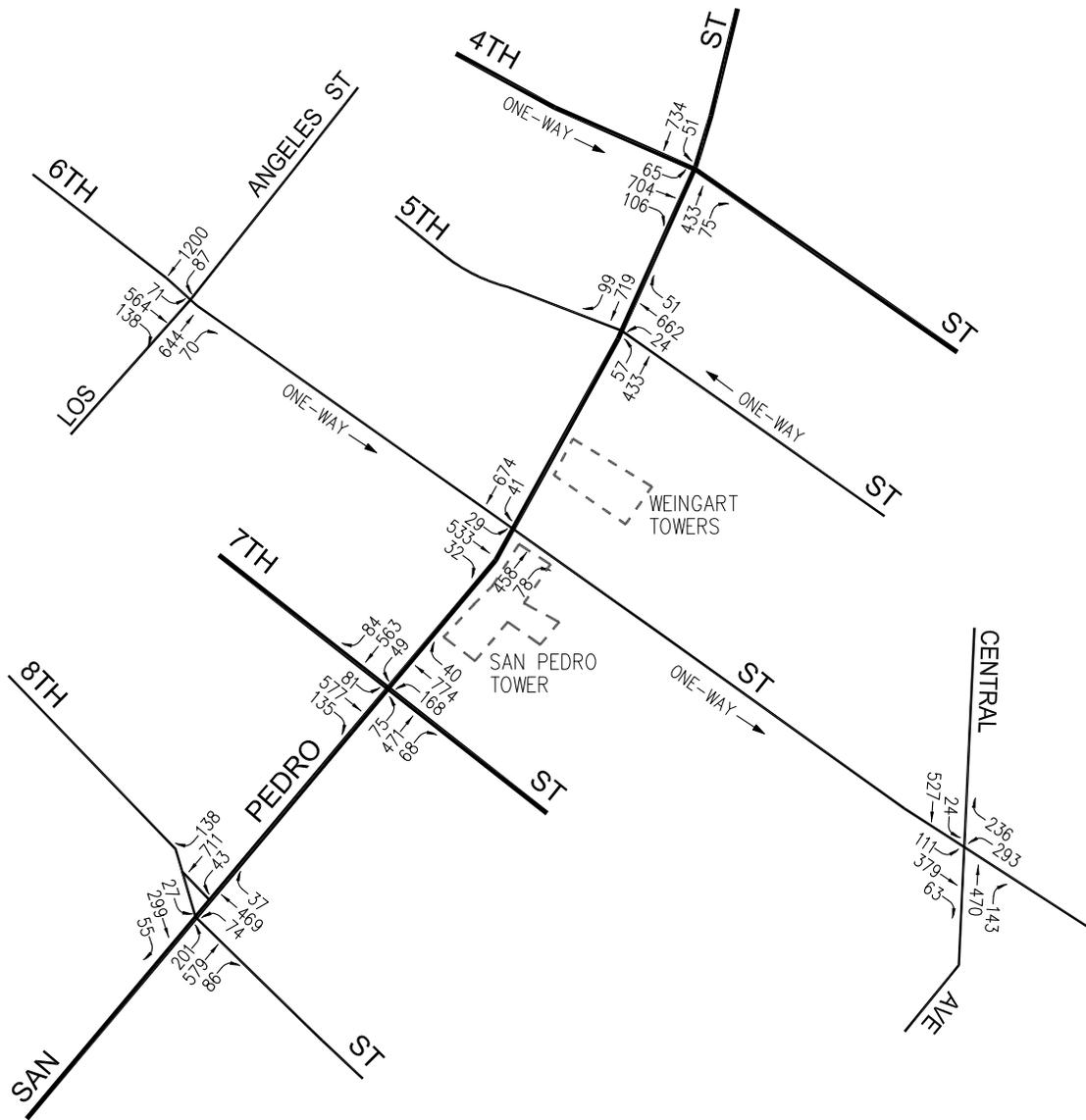
The future without Project (existing, ambient growth, and related projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are presented on Figures 6-17 and 6-18, respectively. The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The v/c ratios at all of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed on Table 6-68. As presented in column [3] on Table 6-65, all seven study intersections are expected to operate at LOS C or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects traffic under the future without Project conditions.

Future (2025) With Project Impacts

The future with Project (existing, ambient growth, related projects, and Project) traffic volumes at the study intersections during the weekday AM and PM peak hours are provided on Figures 6-19 and 6-20, respectively. As shown in column [4] on Table 6-65, application of the City's threshold criteria to the future with Project scenario indicates that the Project would not create significant impacts at any of the seven study intersections. Therefore, cumulative intersection LOS impacts would be less than significant

Construction Traffic Impacts

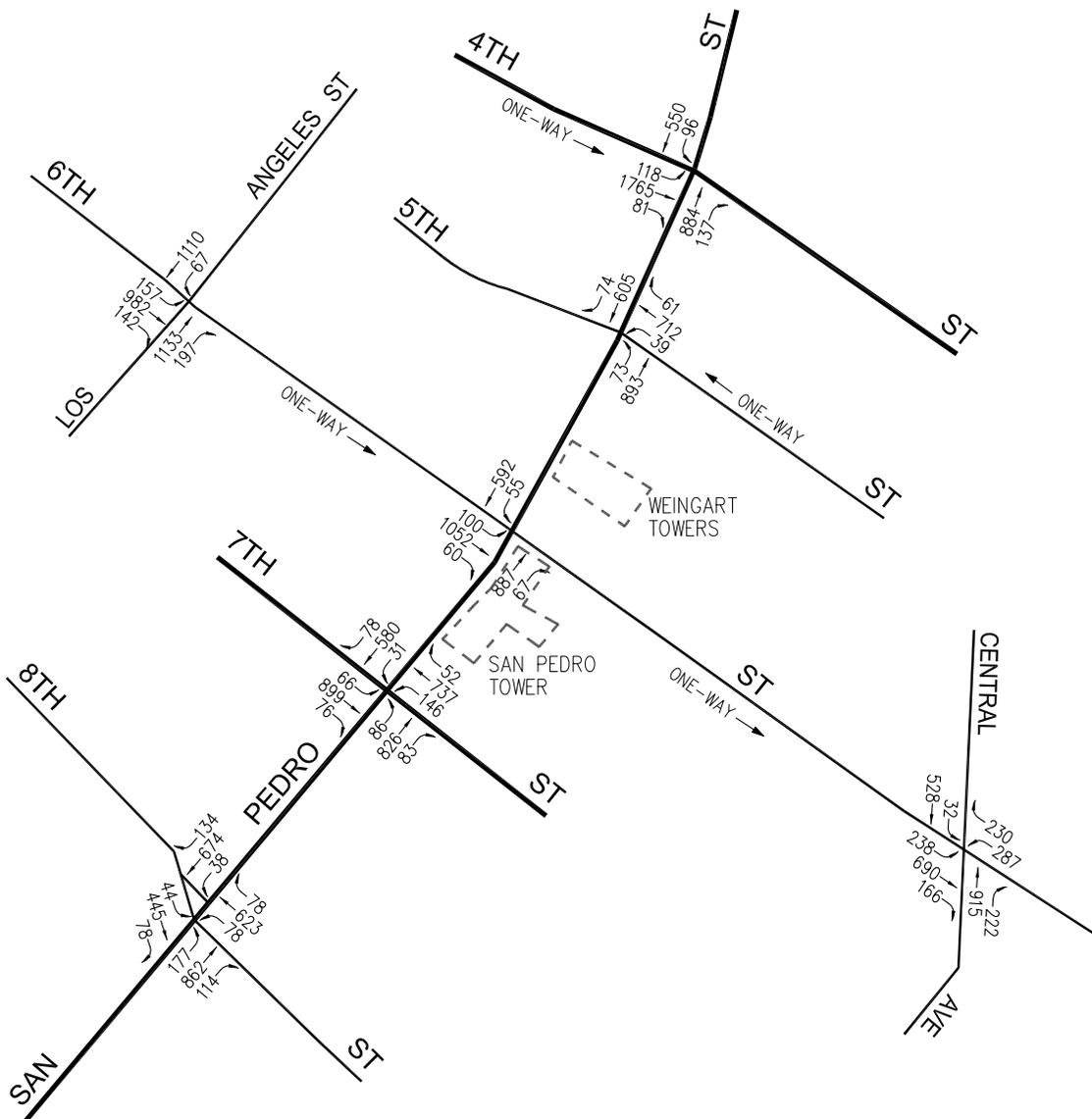
The Project would be constructed over three phases, as shown on Table 6-5 (refer to response to Checklist Question 3[b], Air Quality – Construction Emissions).



[- - -] PROJECT SITES



Figure 6-17
 Future Without Project Traffic Volumes
 Weekday AM Peak Hour

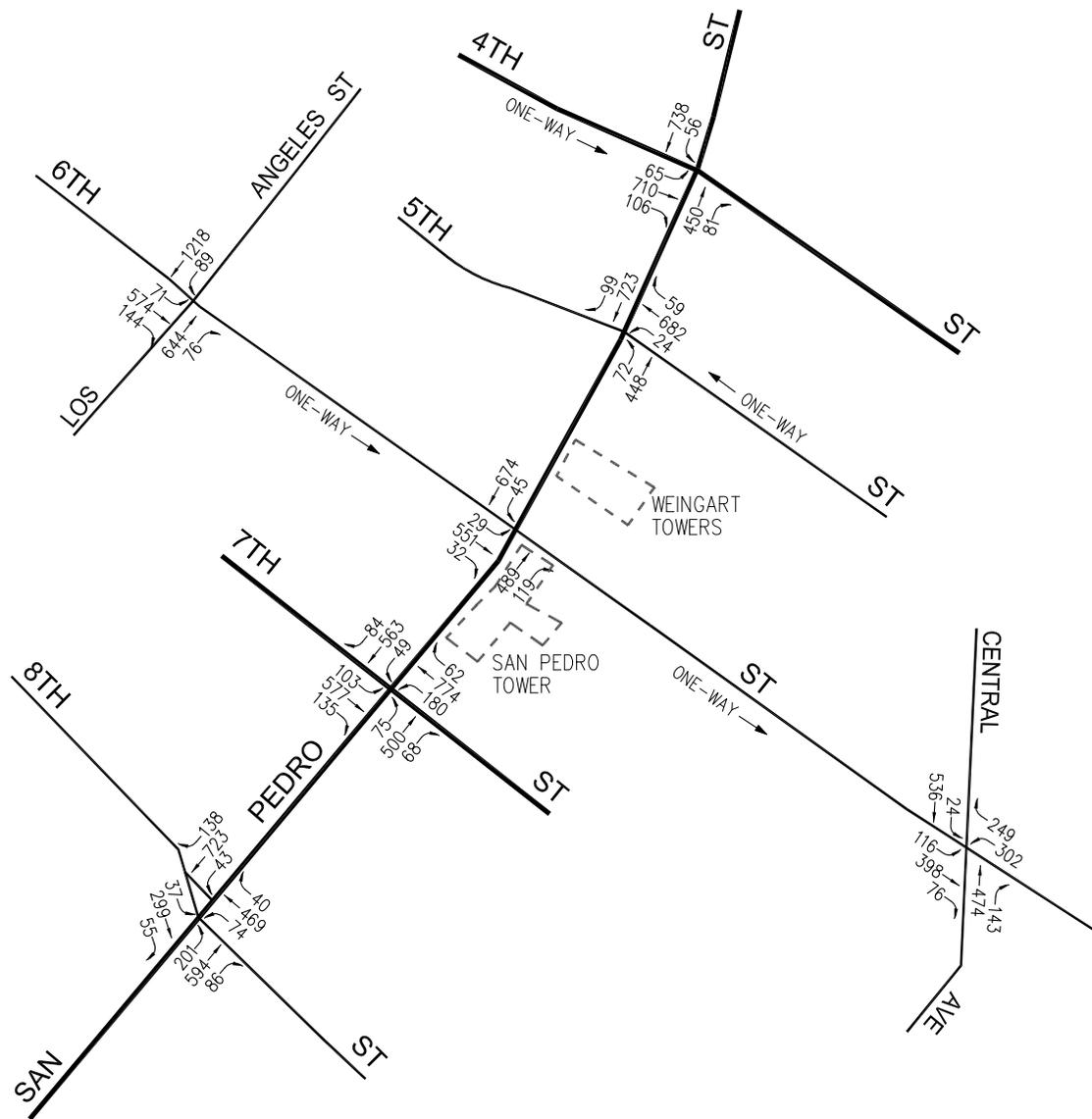


[- - -] PROJECT SITES



Figure 6-18
 Future Without Project Traffic Volumes
 Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

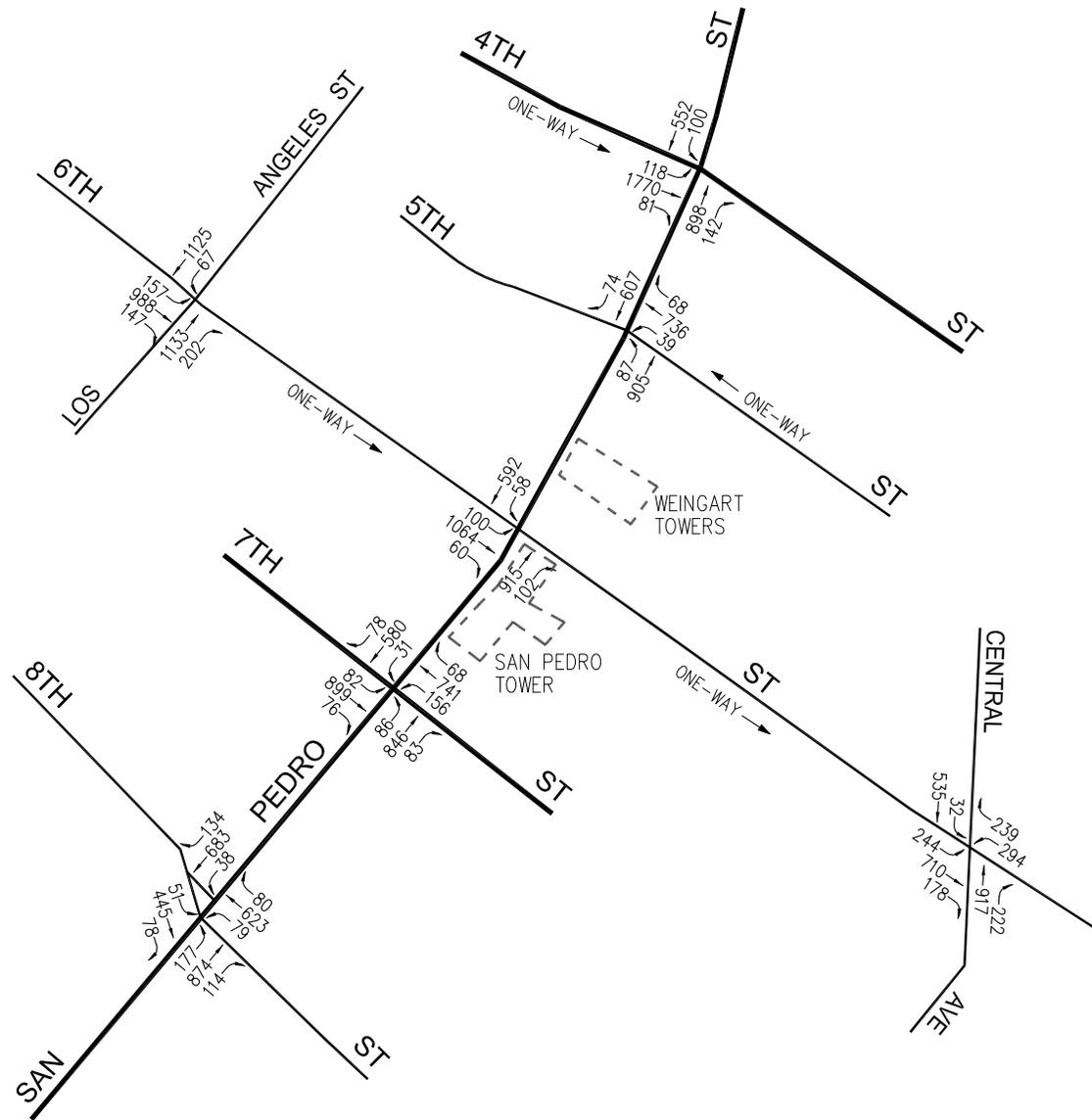


[- - -] PROJECT SITES



Figure 6-19
 Future With Project Traffic Volumes
 Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES



Figure 6-20
 Future With Project Traffic Volumes
 Weekday PM Peak Hour

The Project's construction phase would begin with development of Tower 1A on Site 1 that would occur over approximately 17 months. During the finishing and architectural coating phase of Tower 1A, the construction phase for Tower 1B would begin and would occur over approximately 18 months. During the building construction phase for Tower 1B, Tower 1A would become operational. The construction phase for Site 2 would occur over approximately 18 months, just after Tower 1B also becomes operational.

The most intensive period of overall traffic generation during any phase of Project construction would occur during the overlap of the construction of Site 2, after Towers 1A and 1B become operational and is estimated to occur over a period of approximately 1 month. For the weekday AM peak hour, the peak construction traffic generation would occur during the Grading and Excavation activities of Site 2 overlapping with the operational traffic associated with Towers 1A and 1B. For the weekday PM peak hour, the peak construction traffic generation would occur during the building construction activities at Site 2 overlapping with the operational traffic associated with Towers 1A and 1B. At this time, it is not known if any temporary lane closures would be necessary through the course of the Project construction. However, any such lane closures likely would occur outside of the weekday AM and PM commute peak hours, so as to maintain roadway capacity when the street system is typically most heavily constrained.

Construction Assumptions

It is assumed that demolition and site preparation would occur on each site as described above. The excavation activities would require the total removal of approximately 25,244 cubic yards of material with the following totals for each building: 10,244 cubic yards for Tower 1A, 4,800 cubic yards for Tower 1B, and 10,200 cubic yards for Site 2. It is assumed that the equipment staging area during the initial phases of construction grading would occur on or within the boundaries of the Project Sites. However, it is possible that equipment staging could occur adjacent to the Project Sites within public rights of way. Construction worker parking also could occur on-site during certain times. However, during the building construction activities, workers would likely be required to park at an adjacent lot or at other nearby public parking lots so as to avoid any construction workers parking on adjacent roadways.

The City's Noise Ordinance currently limits construction hours Monday through Friday to no earlier than 7:00 AM and no later than 9:00 PM, and to no earlier than 8:00 AM and no later than 6:00 PM on Saturdays. It is important to note that workers are expected to arrive at the construction sites by 6:30 AM and end their workday by 3:30 PM Monday through Friday. For purposes of this analysis, no Saturday construction activities are assumed and while workers would generally depart the site by 3:30 PM, some worker departures are assumed to overlap with the weekday PM peak hour (i.e., 25 percent) in order to account for supervisors' later departures as well as some overtime when it is necessary to maintain the construction schedule.

Peak Construction Traffic Trip Generation (Weekday AM Peak Hour) – Grading/Excavation Activities Associated With Site 2 Overlapping With Site 1 (Towers 1A and Tower 1B) Operational Traffic

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project Sites on a daily basis. However, truck trips would be generated

during the grading and corresponding export activities in order to remove material from the Project Sites. Trucks are expected to carry the export material to a receptor site(s).

It is anticipated that construction vehicles related to the export activities would have a capacity of 10 cubic yards per truck. It has also been assumed for analysis purposes that all hauling activities would be limited to no earlier than 7:00 AM and end no later than 3:30 PM (i.e., prior to the weekday PM peak hour). Thus, the analysis is conservative in that the excavation and hauling activities are assumed to overlap with the weekday AM peak hour. The export period associated with Site 2 has been estimated to require approximately 11 workdays. During this period, up to 12 truckloads per hour (i.e., 12 inbound trucks and 12 outbound trucks) are anticipated. When accounting for the application of a passenger-car equivalent (PCE) factor of 2.5 to account for the heavier weight and larger size haul trucks, a total of 30 inbound truck PCE trips and 30 outbound truck PCE trips could potentially occur during the weekday AM peak hour. In addition, the operational traffic associated with Site 1 (i.e., Towers 1A and 1B) are forecast to generate 64 inbound and 50 outbound vehicle trips during the weekday AM peak hour. Miscellaneous trucks would travel to and from the sites to account for deliveries and has been estimated at no more than one truck per hour (i.e., no more than three inbound PCE trips and three outbound PCE trips during the weekday AM peak hour). Taken together, a total of 180 trips are forecast to occur during the weekday AM peak hour during this period (i.e., 97 inbound and 83 outbound trips). In addition, it is noted that the proposed haul route would require review and approval by the City.

Given that buildout of the Project would generate approximately 229 net new vehicle trips (i.e., 120 inbound and 109 outbound net new trips) during the weekday AM peak hour (refer to Table 6-67) and no significant traffic impacts are expected (refer to Table 6-65), it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during this peak construction activity of Site 2 (i.e., which overlaps with operational traffic from Site 1). The discussion below provides the forecast of the peak weekday PM peak-hour trip generation during any phase of construction/building operation.

Peak Construction Traffic Trip Generation (Weekday PM Peak Hour) – Building Construction Activities Associated With Site 2 Overlapping With Site 1 (Towers 1A and Tower 1B) Operational Traffic

As described above, the peak construction traffic generation during the weekday PM peak hour would occur during the building construction/architectural coatings construction work of Site 2 overlapping with the operational traffic of Site 1 (i.e., Towers 1A and 1B). Activities related to this phase are expected to generate the highest number of construction worker vehicle trips as compared to the other construction activities and expected to occur over a period of approximately 1 month. Based on information provided by the Project Applicant, the maximum number of construction workers during this phase is expected to total 95 workers. Construction workers are expected to arrive to the Project Sites by 6:30 AM. Assuming the typical workday ends at 3:30 PM, fifty percent of the workers are assumed to leave the sites between 3:30 PM and 4:00 PM, twenty-five percent between 4:00 PM and 4:30 PM, and the remaining twenty-five percent after 4:30 PM (including supervisors). Thus, while these construction worker trips would generally occur outside of the weekday commute peak hours of adjacent street traffic, twenty-five percent of the work force (i.e., 24 workers) have been assumed to overlap with the weekday commute PM peak

hour (i.e., between 5:00 PM and 6:00 PM) in order to provide a conservative forecast of construction traffic generation.

It is anticipated that construction workers would primarily remain on-site throughout the day. The number of construction worker vehicles is estimated using an average vehicle ridership of 1.135 persons per vehicle (as provided in the SCAQMD's CEQA Air Quality Handbook). Thus, it is estimated that approximately 168 vehicle trips (84 inbound trips and 84 outbound trips) on a daily basis would be generated to and from the sites by the construction workers during this peak building construction phase. With 25 percent of the workers conservatively assumed to overlap with the weekday PM peak hour, this would result in 21 outbound construction worker vehicle trips. It is generally anticipated that construction worker-related traffic would be largely freeway oriented. Construction workers would likely arrive and depart via the on- and off-ramps serving the I-10 Freeway, I-110 Freeway, and U.S. 101 Freeway. The most commonly used freeway ramps would be nearest the Project Sites. The construction work force would likely be generated from all parts of the Los Angeles region and are, thereby, assumed to arrive from all directions.

Operational traffic associated with Site 1 (i.e., Towers 1A and 1B) is expected to overlap with this phase of Site 2 construction activities. Site 1 operations are forecast to generate 44 inbound and 60 outbound vehicle trips during the weekday PM peak hour. Miscellaneous trucks would travel to and from the sites to account for site deliveries and has been estimated at no more than one truck per hour (i.e., no more than three inbound PCE trips and three outbound PCE trips during the weekday PM peak hour). Taken together, a total of 131 trips are forecast to occur during the weekday PM peak hour during this period (i.e., 47 inbound and 84 outbound trips).

Given that buildout of the Project would generate approximately 197 net new vehicle trips (i.e., 91 inbound and 106 outbound net new trips) during the weekday PM peak hour (refer to Table 6-67) and no significant traffic impacts are expected (refer to Table 6-65), it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during this peak Site 2 construction activity (i.e., which overlaps with operational traffic from Site 1).

Construction Management and Haul Route Approval

Approvals required by the City and Caltrans for implementation of the Project include a Truck Haul Route program approved by the City and an encroachment permit obtained from Caltrans for truck hauling activities on state highway facilities. With regard to other construction traffic-related issues, construction equipment would be stored within the perimeter fence of the construction site.

As a general contractor has not yet been selected, the exact extent of the construction work-site boundary cannot be determined at this time. However, during certain portions of the construction schedule it is possible that some frontage sidewalks may need to be temporarily closed. Should that be determined to be necessary, appropriate pedestrian detours would be required to be established along with the appropriate advance warning signage directing pedestrians to other available sidewalks and crosswalks/crossings. Should any such pedestrian detours or temporary travel lane closures be proposed, traffic control and management plans will be prepared for the required review and approval by the

LADOT and the Department of Public Works, Bureau of Street Services. However, the Project Applicant would be required to implement Mitigation Measure TRAFFIC-MM-1 and would be required to prepare and implement a Construction Staging and Traffic Management Plan (CSTMP).

The facility(ies) to receive the Project's export materials that would be generated during the Project's construction phase has not been identified at this time. However, several facilities are located within a 50-mile radius of the Project Site, including, but not limited to: Active Recycling MRF and Transfer Station, American Reclamation CDI Processing Facility, Downtown Diversion, and Manning Pit. The Project's haul route would be required to be approved by the City. Project haul trucks would use the most direct route to transport demolition and construction debris from the Project Sites to a designated recycling facility and/or landfill. Regional access to recycling facilities and/or landfills is available to the Project Sites via State Route 110/I-110 Freeway, located approximately 1.0 mile to the west; I-10 Freeway, located approximately 1.5 miles to the south; and State Route 110/I-10 Freeway located approximately 1.0 mile to the east. Direct local access to these freeways and the likely local haul route(s) from the Project Sites could include westbound East 6th Street to State Route 110/I-110 Freeway, southbound South San Pedro Street to the I-10 Freeway, and eastbound East 6th Street to State Route 110/I-10 Freeway.

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

Less Than Significant Impact. The Traffic Impact Analysis (TIA) Guidelines of the 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

Under SB 375, when proceeding with a SCEA, project-specific and cumulative impacts associated with cars and light trucks on the regional transportation network are not required to be assessed, pursuant to PRC 21155.2(b) and 21159.28(a). To the extent that these impacts are included herein is done so for informational purposes only.

Arterial Monitoring Locations

The following CMP arterial monitoring locations are the closest to the Project Sites:

- No. 43: Alameda Street/Washington Boulevard
- No. 44: Alvarado Street/Sunset Boulevard

The Project would not add 50 or more trips during either the AM or PM weekday peak hours (i.e., of adjacent street traffic) at the CMP arterial monitoring locations listed above based on Traffic Impact Study dated March 13, 2018 (Appendix M1). Thus, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is necessary. Therefore, Project impacts related to CMP arterial monitoring locations would be less than significant.

Freeway Monitoring Locations

The following CMP freeway monitoring locations are closest to the Project Sites:

- No. 1036: US Route 101, north of Vignes Street
- No. 1048: Interstate 110, south of US Route 101
- No. 1049: SR-110 Freeway at Alpine Street

Based on Traffic Impact Study dated March 13, 2018 (Appendix M1) and as determined by LADOT (Appendix M2), the Project would not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours to CMP freeway monitoring locations listed above. Thus, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is necessary. Therefore, Project impacts related to CMP freeway monitoring locations would be less than significant.

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

No Impact. The maximum building height on Site 1 would be approximately 200 feet. On Site 2, the maximum building height would be approximately 219 feet. The Project's building heights would be similar to that of existing buildings located in the Downtown area. The Project Sites are not located near any airports; the nearest airport is Hollywood Burbank Airport, 16.9 miles away and thus, the proposed building would not encroach into any air traffic space. Due to the height of the proposed building, the City would be required to file a Form 7460 with the FAA, and would be required to obtain a Determination of No Hazard to Air Navigation from the FAA that would be required to be submitted to the Department of Building and Safety prior to issuance of any building permits. Thus, the Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project does not include development of any new roadways or intersections. Site 1 currently has a total of three driveways (one driveway on San Pedro Street and two driveways on Crocker Street), although it appears that only the northerly driveway on Crocker Street is currently used for vehicular access. Site 2 currently has a total of three driveways (two driveways on 6th Street and one driveway on Crocker Street), although it appears that only the easterly driveway on 6th Street and the Crocker Street driveway are currently used for vehicular access.

Vehicular movements into and out of the Site 1 would be provided via a single driveway on Crocker Street, while vehicular access into and out of Site 2 would be provided via a single driveway on San Pedro Street. Descriptions of the proposed project vehicular site access driveways are provided below.

Site 1 – Crocker Street Driveway: The Site 1 driveway would be located at the northeast corner of the site along Crocker Street (i.e., along the easterly property frontage). This driveway would be located in essentially the same location as an existing site driveway that is currently inactive. One inbound lane and

one outbound lane would be provided at this location with gate control equipment located such that no vehicle queuing would extend back out onto the public right-of-way. This driveway is planned to accommodate full access (i.e., left-turn and right-turn ingress and egress turning movements) for motorists accessing Site 1. The Crocker Street driveway would be constructed to City design standards.

Site 2 – San Pedro Street Driveway: The Site 2 driveway would be located at approximately 118 feet south of the East 6th Street along South San Pedro Street (i.e., along the westerly property frontage). One inbound lane and one outbound lane would be provided at this location with gate control equipment located such that no vehicle queuing would extend back out onto the public right-of-way. Based on preliminary comments received from LADOT staff, this driveway would be restricted to right-turn ingress and egress turning movements for motorists accessing Site 2. The driveway would be constructed to City design standards.

All ingress/egress points associated with the Project would be designed and constructed in accordance with the requirements of the LADBS, the City’s Department of Public Works, and LADOT. Therefore, Project impacts related to roadway hazards would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. Prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Through compliance with existing City regulations, the Project would not result in any significant impacts related to emergency access.

f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. During the Project’s construction phase, sidewalks adjacent to the Project Sites could be impeded. However, the Project Applicant would be required to comply with LAMC Section 62.45 and provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.

As required by the *2010 Congestion Management Program*, a review has been made of the potential impacts of the Project on transit service. As discussed previously, existing transit service is provided in the vicinity of the Project Sites.

Project trip generation shown on Table 6-66 was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for 11 and 10 transit trips during the weekday AM and PM peak hours, respectively. Over a 24-hour period, the would generate demand for approximately 100 daily transit trips. The calculations are as follows:

- Weekday AM Peak Hour = $229 \times 1.4 \times 0.035 = 11$ Transit Trips

- Weekday PM Peak Hour = $197 \times 1.4 \times 0.035 = 10$ Transit Trips
- Weekday Daily Trips = $2,038 \times 1.4 \times 0.035 = 100$ Transit Trips

As shown on Table 6-62, 11 bus transit lines and routes are provided in close proximity to the Project Sites. As outlined on the table under the “No. of Buses During Peak Hour” column, these 11 transit lines provide services for an average of (i.e., average of the directional number of buses/trains during the peak hours) roughly 139 and 145 buses during the weekday AM and PM peak hours, respectively. Thus, based on the above calculated weekday AM and PM peak-hour trips, this would correspond to less than one additional transit rider per bus. It is anticipated that the existing transit service in the area of the Project Sites would adequately accommodate the increase of Project-generated transit trips. Thus, given the number of Project-generated transit trips per bus, no project impacts on existing or future transit services in the area of the Project Sites would occur as a result of the Project.

Mitigation Measures (Construction Traffic)

To ensure that Project impacts related to construction traffic would be less than significant, the following mitigation measure is required:

TRAFFIC-MM-1: Construction Staging and Traffic Management Plan

Prior to issuance of a demolition permit, in coordination with LADOT and the Department of Building and Safety, the Project Applicant shall prepare a detailed Construction Staging and Traffic Management Plan (CSTMP), including street closure information, detour plans, haul routes, and staging plans. The CSTMP shall outline how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CSTMP shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include the following elements as appropriate:

- Provide for temporary traffic control during all construction activities within public rights-of-way to improve traffic flow on public roadways (e.g., flagmen);
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Reroute construction trucks to reduce travel on congested streets to the extent feasible;
- Prohibit construction-related vehicles from parking on surrounding public streets;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers in compliance with LAMC Section 62.45;
- Accommodate all equipment on-site; and

- Prepare a haul truck route program for the Project that specifies the routes to and from the Project Sites.

Cumulative Impacts

Cumulative intersection LOS impacts were addressed previously under “Future (2025) With Project Impacts.” As shown on Table 6-65, no significant cumulative intersection LOS impacts would occur.

As noted previously, while there are 161 related projects that fall within a 1.5-mile radius of the Project, only a few of the related projects are located within about a four-block radius of the Project. Two related projects (Nos. 105 and 122) are located on or near eastbound East 6th Street; one related project (No. 35) is located on or near westbound East 6th Street; and two related projects (Nos. 27 and 151) are located on or near southbound South San Pedro Street. It is possible that the construction of some of these related projects could overlap with the Project’s construction phase. However, similar to the Project, those projects would be required to prepare and implement a CSTMP (refer to Mitigation Measure TRAFFIC-MM-1) should any temporary lane closures or re-routing of vehicle and bicycle traffic, sidewalk closures and pedestrian re-routing be anticipated.

While the exact duration of any cumulative construction activities is unknown at this time, no other related projects are located in the immediate vicinity on San Pedro Street, 6th Street, or Crocker Street. As stated previously, the Project’s construction phase is estimated to occur over approximately 49 months. Thus, the cumulative impacts during concurrent construction activities are forecast to be less than significant. Also, as discussed previously, the Project’s peak-hour construction traffic generation would be much less than the Project’s overall peak hour operational traffic generation, and would not be result in any significant intersection LOS impacts.

17. TRIBAL CULTURAL RESOURCES

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 size and scope of the landscape, sacred place, or object with cultural value to a California Native tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**

Less Than Significant Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. As discussed in response to Checklist Question 5(a), the Project Sites do not contain any resources that are listed or eligible for listing in the California Register, National Register, or any other local register or historical resources. No significant tribal cultural resources are known to exist at the Project Sites. Specifically, as discussed in response to Checklist Question 5(b), based on a records search conducted by the South Central Coast Information Center, 4 archaeological sites have been recorded within a 0.5-mile radius of the Project Sites, and no sites have been recorded at the Project Sites (refer to

Appendix G). However, unknown buried remains of the Zanja Madre (a historical water conveyance system) could potentially fall within the boundaries of the Project Sites.¹⁶² As such, it is possible that unknown tribal cultural resources could exist at the Project Sites and could be encountered during grading and excavation activities. To prevent such potential impacts, the Project Applicant would be required to implement Mitigation Measures CULT-MM-1 through CULT-MM-3, which would ensure that Project impacts related to unknown archaeological resources would be less than significant. Additionally, the Project Applicant would be required to implement the City's standard condition of approval related to the inadvertent discovery of tribal cultural resources that requires that in the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below.¹⁶³

- Upon a discovery of a potential tribal cultural resource, the Project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 473-9723.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications

¹⁶² *Record Search Results for the Weingart Project, South Central Coast Information Center, December 4, 2017. Refer to Appendix G.*

¹⁶³ *Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity*

and experience to mediate such a dispute. The Project Permittee shall pay any costs associated with the mediation.

- The Project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

Compliance with this standard City condition of approval would ensure that Project impacts related to unknown tribal cultural resources would be less than significant.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration (or other similar CEQA document) on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day consultation period on March 29, 2017. The City conducted consultation with the Gabrielino Tribe on May 17, 2017 (refer to Appendix N). In addition to the verbal information provided during the consultation, the representative of the Gabrielino Tribe stated that additional evidence would be provided to the City. Subsequent to the consultation the Gabrielino Tribe did not provide any evidence that tribal cultural resources are located on the Project Sites. As a result, the City closed consultation. Nonetheless, it is possible that unknown archaeological resources could exist at the Project Sites that could be encountered within the underlying alluvium, given the relative sensitivity of the Project region.

Nonetheless, the Project Applicant would be required to implement the City's standard condition of approval related to the inadvertent discovery of tribal cultural resources outlined above, which would ensure that Project impacts related to unknown tribal cultural resources would be less than significant.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's conditions of approval, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Sites and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

18. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

No Impact. The Project Sites are located within the service area of the Hyperion Water Reclamation Plant (HWRP), which treats sewage and some stormwater from the Los Angeles area. The Project would generate approximately 99,226 gallons of wastewater per day (or 0.09 mgd) that is typically associated with residential/office/retail land uses and would not generate any wastewater, such as that from industrial and some commercial uses, which would require pre-treatment.¹⁶⁴ Thus, the Project would not exceed wastewater treatment requirements of the applicable regional water quality control board. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the need for wastewater treatment. Most of the related projects would generate wastewater that would not require any special pre-treatment. Related projects that would require special wastewater treatment would be required to comply with the treatment requirements of the relevant wastewater treatment plant. For these reasons, cumulative impacts related to wastewater treatment would be less than significant.

¹⁶⁴ *This assumes that wastewater generation equal water consumption.*

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

Less Than Significant Impact. LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 million gallons per day (mgd), with an average plant flow of 550 mgd during the summer months and 450 mgd during the remaining months of the year. Thus, the facility has between 50 to 150 mgd of remaining capacity, depending on the season. As shown on Table 6-69, the Project would consume approximately 99,226 gallons of water per day (or 0.09 mgd). (Corresponding water conservation calculations for the Project are shown on Table 6-70.) With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

**Table 6-69
Estimated Project Water Demand**

Existing Water Uses to be Removed						
Existing Use¹	Size	(gpd)	(af/y)			
Food Services Center	7,000 sf	957				
Surface Parking	N/A	0				
Existing to be Removed Total²		957	1.07			
Estimated Project Water Demand						
Proposed Uses¹	Size	Water Use Factor³ (gpd/unit)	Base Demand (gpd)	Required ordinances		
				Water Savings⁴ (gpd)	(gpd)	(af/y)
Residential Efficiency ⁵	332 du	150	49,800			
Residential: Apt. 1 bd ⁶	50 du	180	9,000			
Base Demand Adj. (Residential Units) ⁷			5,898			
Site 1 Residential Units Total	382 du		64,698	10,645	54,053	60.55
Cafeteria	271 seat	30	8,130			
Office	7,683 sf	0.12	922			
Community ⁸	6,347 sf	0.12	762			
Retail	2,250 sf	0.025	56			
Base Demand Adjustment (Other) ⁷			90			
Site 1 Other Total			9,960	1,750	8,210	9.20
Residential: Efficiency ⁶	303 du	150	45,450			
Base Demand Adjustment (Residential Units) ⁷			4,391			
Site 2 Residential	303 du		49,841	7,850	41,991	47.04

**Table 6-69
Estimated Project Water Demand**

Units Total						
Office	17,100 sf	0.12	2,052			
Retail	3,200 sf	0.025	80			
Base Demand			138			
Adjustment (Other) ⁷						
	Site 2 Other Total		2,270	1,048	1,222	1.37
Landscaping ⁹	13,254 sf		1,238	557	681	0.76
Parking Structure ¹⁰	107,335 sf	0.02	71	0	71	0.08
			Subtotal	128,078	21,850	106,226
					119.00	
					<i>Less Existing to be Removed Total</i>	<i>-957</i>
					<i>Less Additional Conservation¹¹</i>	<i>-6,045</i>
						<i>-6.77</i>
					Net Total Water Demand	99,226
						111.16
¹	<i>Provided by City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope Confirmation e-mail. See Appendix A of the WSA.</i>					
²	<i>The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017).</i>					
³	<i>Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer. Generation Rates table available at https://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.</i>					
⁴	<i>The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2016 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.</i>					
⁵	<i>Water Use Factor for Efficiency Units is based on 2 persons occupancy.</i>					
⁶	<i>Water Use Factor for 1 bedroom Units is based on 3 persons occupancy.</i>					
⁷	<i>Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.</i>					
⁸	<i>Community water use is assumed to be similar to counseling center.</i>					
⁹	<i>Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Modal Water Efficient Landscape Ordinance.</i>					
¹⁰	<i>Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.</i>					
¹¹	<i>Water Conservation due to additional conservation commitments agreed to by the Applicant. See Table 6-70.</i>					
	<i>Abbreviations: bd-bedroom du-dwelling unit sf-square feet gpd-gallons per day af/y-acre feet per year</i>					
	<i>Source: LADWP, WSA, 2018.Refer to Appendix O.</i>					

Table 6-70
Estimated Additional Water Conservation

Conservation Measures ¹	Quantity Units	Water Saving Factor ² (gpd/unit)	Water Saved	
			(gpd)	(af/y)
Total – Residential: Efficiency	635 du	3.08	1,956	2.19
Toilet – Residential: 1 Bd	50 du	4.62	231	0.26
Bathroom Faucet – Residential: Efficiency	635 du	1.62	1,029	1.15
Bathroom Faucet – Residential: 1 Bd	50 du	2.43	122	0.14
Showerhead – Residential: Efficiency	635 du	3.18	2,019	2.26
Showerhead – Residential: 1 Bd	50 du	4.77	239	0.27
<i>Residential Unit Conservation Total</i>			<i>5,596</i>	<i>6.27</i>
Toilet	20 ea	6.09	122	0.14
<i>Residential Common Conservation Total</i>			<i>122</i>	<i>0.14</i>
Toilet	5 ea	6.09	30	0.03
<i>Cafeteria Conservation Total</i>			<i>30</i>	<i>0.003</i>
Toilet	4 ea	6.09	24	0.03
<i>Retail Conservation Total</i>			<i>24</i>	<i>0.03</i>
Toilet	12 ea	6.09	73	0.06
<i>Office Conservation Total</i>			<i>73</i>	<i>0.06</i>
<i>Landscaping Conservation Total³</i>			<i>200</i>	<i>0.22</i>
Total Additional Water Conserved			6,045	6.77
¹ Water conservation measures agreed to by the Applicant. See Appendix B.				
² Based on LADWP estimates.				
³ Landscaping water conservation is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Model Water Efficient Landscape Ordinance.				
Abbreviations: du-dwelling unit gpd-gallons per day af/y-acre feet per year ea-each				
Source: LADWP, WSA, 2018. Refer to Appendix O.				

As discussed in response to Checklist Question 18(a), the Project Sites are located within the service area of the HWRP, which has been designed to treat approximately 450 million gallons per day of wastewater for full secondary treatment and currently treats approximately 275 million gallons per day.¹⁶⁵ Full secondary treatment prevents virtually all particles suspended in the effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board (LARWQCB) discharge polices for the Santa Monica Bay. The HWRP currently treats an average daily flow of approximately 240 mgd and thus, is operating below its design capacity.¹⁶⁶ Conservatively assuming that wastewater generation equals water consumption, the Project would generate approximately 99,226 gallons of wastewater per day (or 0.09 mgd). With a remaining daily capacity of 210 mgd, the HWRP would have adequate capacity to serve the Project. Additionally, detailed gauging and evaluation of the existing sewer system adjacent to the Project Sites would be required as part of the

¹⁶⁵ City of Los Angeles https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=xv7pssow_4&_afriLoop=2072052347671516#!, April 2018.

¹⁶⁶ City of Los Angeles, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, Overview, <https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/cnt012544.pdf>, accessed June 26, 2017.

permitting process to identify a specific sewer connection point as is standard City practice. If necessary, the Project Applicant would be required to build improvements to convey wastewater to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit from the City would be made at that time. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) increase the need for water treatment. The remaining treatment capacity of the LAAFP (50 to 150 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent (approximately 0.19 to 0.07 percent) of the remaining capacity of the LAAFP, and would not result in any significant impacts related to water treatment. Further, the remaining treatment capacity of the HWRP (210 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent (approximately 0.09) of the remaining capacity of the HWRP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. As such, the Project's incremental effect on cumulative impacts to water treatment capacity would not be cumulatively considerable, and cumulative wastewater impacts would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question 9(e), Project impacts related to storm water drainage would be less than significant.

Cumulative Impacts

Refer to the discussion of cumulative impacts under response to Checklist Topic 9.

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

Less Than Significant Impact.

Pursuant to SB 610 and SB 221, a Water Supply Assessment (WSA) was prepared for the Project by LADWP (refer to Appendix O). As shown on Table 6-69, LADWP estimates that the Project would consume approximately 99,226 gallons of water per day. The Project Applicant has voluntarily committed to incorporate the water conservation measures listed below into the Project that are beyond those required by the City's Green Building Code (refer to PDF-1, Sustainability Measures, in Section 2 [Project Description]). The estimated additional water conservation calculations associated with this measures outlined on Table 6-70.

- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.
- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

LADWP's WSA finds adequate water supplies would be available to meet the total additional water demand of 99,226 gallons per day for the Project. LADWP anticipates the projected water demand from the Project could be met during normal, single-dry, and multiple-dry water years, in addition to the existing and planned future demands on LADWP.

The basis for approving the WSA for the Project is LADWP's most recently adopted 2015 Urban Water Management Plan (2015 UWMP). LADWP's water demand forecast, as contained in the 2015 UWMP, uses long-term demographic projections for population, housing, and employment. The California Urban Water Management Planning Act requires water suppliers to develop a UWMP every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. If the projected water demand associated with the Project was not accounted for in the most recently adopted UWMP, WSA must include a discussion with regard to whether LADWP's total projected water supplies available during normal, single-dry, and multiple-dry water years during a 20-year projection would meet the projected water demand associated with the Project, in addition to LADWP's existing and planned future uses.

The City's water demand projection in the 2015 UWMP was developed based on the 2012 Regional Transportation Plan (RTP) demographic projection by SCAG using the 2010 U.S. Census for the City. The 2015 UWMP concluded there are adequate water supplies to meet projected water demands through 2040. Thus, the City's water supply projections in the 2015 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP.

The Planning Department has determined that a General Plan Amendment is required for the Project to change the Central City Community Plan land use designation from Light Manufacturing to Regional Center Commercial. Furthermore, the Planning Department has determined that the Project is consistent with the demographic projections for the City from both the 2012 and 2016 RTPs. Based on the information provided by Planning Department, anticipated water demand for the Project fall within the 2015 UWMP's projected water supplies for normal, single-dry, and multiple-dry years through the year 2040 and is within the 2015 UWMP's 25-year water demand growth projection.

Additionally, the 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrological periods. This water shortage contingency plan was implemented on June 1, 2009, when the Board of Water and Power Commissioners (Board) adopted Shortage Year Rates, and the City Council implemented the landscape irrigation and prohibited use restrictions contained in the City's Water Conservation Ordinance. The City's Water Rate Ordinance, adopted in June 1995, was last amended by the Board, effective April 15, 2016. The revised rate ordinance restructured the rates to help further promote conservation. For example, single-family rates switched to a four-tier system that sends a strong price signal to deter against wasteful water use. The Board finds that the price signals contained in the Water Rate Ordinance encourage conservation and support further reduction in citywide demand. Past and current implementation of water rate price signals and higher ordinance phases have resulted in reducing the total customer water usage, on average, by approximately 20.2 percent over the time period from June 2009 to March 2018.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects identified on Table 2-2 in Section 2 (Project Description) would increase demand for water services provided by the City's water supply system. Through its UWMP, LADWP (through its UWMP) anticipates its projected water supplies will meet demand through the year 2035. In terms of the City's overall water supply condition, any related project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's RTP and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands.

For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, each related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA necessary approval. The CEQA analysis would compare the existing to the proposed uses and the ability of LADWP supplies and infrastructure to provide a sufficient level of water service. Future development projects within the service area of LADWP would be subject to the locally mandated water conservation programs, and citywide water conservation efforts would also be expected to partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. Additionally, as stated previously, in the WSA prepared for the Project, LADWP concluded that the Project's demand for water supply has been accounted for in the most recent UWMP, and Project-specific impacts related to water supply would be less than significant. For these reasons, cumulative impacts related to water service would be less than significant.

The WSA has demonstrated that the Project's demand for water supply can be accommodated by existing sources, and the Project would not require the need for new or expanded sources of water supply. Therefore, Project impacts related to water supply would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question 18(a), with a remaining daily capacity of 210 mgd, the HWRP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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

Less Than Significant Impact. Landfills that serve the Los Angeles area are shown on Table 6-71. As shown, the landfills serving Los Angeles have a remaining daily intake capacity of 14,920 tons per day.

**Table 6-71
Landfill Capacity**

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	21	62.1	12,100	7,496	4,604
Chiquita Canyon Proposed Expansion	-	-	12,000	-	-
Azusa	30	56.33	6,500	1,183	5,317
Lancaster	25	10.44	3,000	550	2,450
Calabasas	20	5.95	3,500	951	2,549
Total					14,920
<i>Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2016 Annual Report, December 2017.</i>					

As shown on Table 6-72, the Project would generate approximately 1.49 tons of solid waste per day. With a remaining daily capacity of 14,920 tons per day (tpd), the existing landfill capacity in the Los Angeles area would be adequate to accommodate the Project's solid waste generation. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As of fiscal year 2013, the City achieved a waste diversion rate of 76.4 percent, exceeding the required 50 percent diversion rate required by AB 939. The

City is on track toward its goal to achieve a 90 percent diversion by 2025.¹⁶⁷ Thus, the Project would not require new or expanded landfill capacity. Therefore, Project impacts related to solid waste would be less than significant.

Table 6-72
Estimated Solid Waste Generation

Land Use	Size	Generation Rate ^a	Total (tpd)
Multi-Family Residential	685 du	4 lbs/day	1.37
Commercial	48,043 sf	0.005 lbs/day	0.12
Total			1.49
<i>du=dwelling unit sf=square feet lbs=pounds tpd= tons per day</i> ^a Source: CalRecyclewebsite: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm , 2014 Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.			

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the need for landfill capacity. However, all development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated by the development and the need for landfill capacity. As discussed previously, the landfills serving the Project area have available capacity. The Project would create a demand for less than a fraction of one percent of the remaining landfill capacity serving the Project area and would not result in any significant impacts. Therefore, cumulative impacts related to landfill capacity would be less than significant.

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

No Impact. As stated previously, State regulation AB 939 required every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

The Project would be required to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance and the Curbside Recycling Program, and there would be no impacts related to this issue.

¹⁶⁷ City of Los Angeles, Solid Waste Integrated Resources Plan (Zero Waste Plan), https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=wna7nj39o_74&_afLoop=2044262225404954#!, accessed on April 30, 2018.

Cumulative Impacts

All development in the City, including the proposed Project and the related projects listed on Table 2-2 in Section 2 (Project Description) is required to comply with the City’s recycling programs. No cumulative impacts related to this issue would occur.

ENERGY CONSERVATION

Regulatory Setting

Federal

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the “maximum feasible level” with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.¹⁶⁸

State

Building Energy Efficiency Standards

The Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the California Energy Commission (CEC) to establish performance standards, in the form of an “energy budget” in terms of the energy consumption per square foot of floor space. For this reason, the Building Energy Efficiency Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Building Energy Efficiency Standards that contain data and other information that helps builders comply with the Building Energy Efficiency Standards.

The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Building Energy Efficiency Standards include improvements for attics, walls, water heating, and lighting, as well as alignment with the American

¹⁶⁸ United States Department of Transportation, *CAFE standards*, www.nhtsa.gov/fuel-economy, accessed on May 7, 2018

Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Building Energy Efficiency Standards. The 2016 Building Energy Efficiency Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The Building Energy Efficiency Standards are enforced through the local building or individual agency permit and approval processes.¹⁶⁹

California Green Building Standards Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code (CaLGreen). The purpose of CalGreen is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.” As of January 1, 2011, compliance with CalGreen is mandatory for all new buildings constructed in the state. CalGreen establishes mandatory measures for new residential and non-residential buildings, including energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. CalGreen was most recently updated in 2016 (2016 CalGreen Code) to reflect regulatory changes that were made to Title 24 and to include Verification Guidelines for use by local building departments, builders, and designers, that is intended to highlight and clarify both mandatory and voluntary nonresidential. The updated 2016 CalGreen Code took effect on January 1, 2017. The Project would be required to comply with the lighting power requirements in the California Energy Code, CCR, Title 24, Part 6.

California Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, California’s Renewable Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.¹⁷⁰ The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC’s responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility’s renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy. The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources, and adopting regulations for the enforcement of RPS procurement requirements of public-owned utilities.

¹⁶⁹ CEC, *2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings*, June 2015.

¹⁷⁰ CPUC, *California Renewables Portfolio Standard (RPS)*, www.cpuc.ca.gov/RPS_Homepage/, accessed May 7, 2018.

Senate Bill 50

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.¹⁷¹

Assembly Bill 32

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.¹⁷²

Assembly Bill 1493/Pavley Regulations

AB 1493 (commonly referred to as CARB’s Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations are expected to reduce GHG emissions from California’s passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists’ costs.¹⁷³

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.¹⁷⁴

CARB’s Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program (ACC program) was approved by CARB in 2012. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles for model

¹⁷¹ *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.*

¹⁷² *Ibid.*

¹⁷³ *Clean Car Standards - Pavley, Assembly Bill 1943, www.energy.ca.gov/low_carbon_fuel_standard/*

¹⁷⁴ *Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/*

years 2017-2025. The components of the ACC program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.¹⁷⁵

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

Senate Bill 375, Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG emissions reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a “sustainable communities strategy” (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.¹⁷⁶

SCAG is the MPO for the area in which the Project Sites are located. SCAG’s first-ever SCS is included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. In 2016, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).¹⁷⁷ The goals and policies of the 2016-2040 RTP/SCS are the same as those in the 2012–2035 RTP/SCS.

¹⁷⁵ CARB, *California’s Advanced Clean Cars Program*, www.arb.ca.gov/msprog/acc/acc.htm, last reviewed by CARB January 18, 2017.

¹⁷⁶ *Sustainable Communities*, www.arb.ca.gov/cc/sb375/sb375.htm

¹⁷⁷ SCAG, *2016 RTP/SCS*, dated April 2016.

Senate Bill 1389

SB 1389 (Public Resources Code Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2016 Integrated Energy Policy Report, addresses a variety of issues including the environmental performance of the electricity generation system, landscaped-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, update on the Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and includes the *California Energy Demand Forecast*.¹⁷⁸

California Environmental Quality Act

In accordance with the California Environmental Quality Act (CEQA) and Appendix G, Energy Conservation, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix G of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in the EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix G provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the project:

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

¹⁷⁸ CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017.

Regional

SCAG’s 2016-2040 RTP/SCS presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. On April 7, 2016, the SCAG Regional Council adopted the 2016-2040 RTP/SCS, the mission of which is “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.”¹⁷⁹ The 2016-2040 RTP/SCS includes land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial building types. Furthermore, the 2016-2040 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increase transit use, active transportation opportunities, and promoting more walkable and mixed-use communities, which would potentially help to reduce VMT.

The 2016-2040 RTP/SCS also establishes High-Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.¹⁸⁰ Local jurisdictions are encouraged to focus housing and employment growth within QTAs to reduce VMT. The Project Sites are located within an HQTA as designated by the 2016-2040 RTP/SCS.¹⁸¹

Local

Green LA: An Action Plan to Lead the Nation in Fighting Global Warming and ClimateLA

Green LA is the City’s climate action plan. The plan, released in May 2007, sets forth a goal of reducing the City’s GHG emissions to 35 percent below 1990 levels by the year 2030.¹⁸² ClimateLA is the implementation program that provides detailed information about each action item discussed in the Green LA framework. ClimateLA includes focus areas addressing environmental issues including but not limited to energy, water, transportation, and waste.¹⁸³ The energy focus area includes action items with measures that aim to increase the use of renewable energy to 35 percent by 2020, reduce the use of coal-fired power plants, and present a comprehensive set of green building policies to guide and support private sector development.¹⁸⁴

¹⁷⁹ SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, dated April 2016.

¹⁸⁰ SCAG, 2016–2040 RTP/SCS, p. 8.

¹⁸¹ SCAG, 2016–2040 RTP/SCS; Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.

¹⁸² City of Los Angeles, Green LA: An Action Plan to Lead the Nation In Fighting Global Warming, May 2007.

¹⁸³ City of Los Angeles, Climate LA: Municipal Program Implementing the GreenLA Climate Action Plan, 2008.

¹⁸⁴ Ibid.

City of Los Angeles Green Building Code

The City's Green Building Code is based on CalGreen (discussed above), which was developed and mandated by the state to attain consistency among the various jurisdictions within the state with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the City's Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and nonresidential)
- Alterations with building valuations over \$200,000 (residential and non-residential)

Specific measures that may be incorporated into the Project could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete
- Use of sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to storm drain systems; and
- Provision of EV charging stations in the parking structure.

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX (Green Building Code) of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CalGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the City's Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced. For example, in 2015, 3.61 million tons of aluminum was produced by recycling in the United States, saving enough energy to provide electricity to 7.5 million homes.¹⁸⁵ In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.¹⁸⁶ The City includes programs and ordinances related to solid waste. They include: (1) the City of Los Angeles Solid Waste Management Policy Plan, which was adopted in 1993 and is a long-range policy plan promoting source reduction for recycling for a minimum of 50 percent of the City's waste by 2000 and 70 percent of the waste by 2020; (2) the RENEW LA Plan, which is a Resource Management Blueprint with the aim to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources now going to disposal so as to achieve an overall diversion level of 90 percent or more by 2025; (3) the Waste Hauler Permit Program (Ordinance 181,519), which requires all private waste haulers collecting solid waste, including construction and demolition waste, to obtain AB 939 Compliance Permits and to transport construction and demolition waste to City certified construction and demolition processing facilities; and (4) the Exclusive Franchise System Ordinance (Ordinance No. 182,986), which, among other requirements, sets maximum annual disposal levels and specific diversion requirements for franchised waste haulers in the City to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. These solid waste reduction programs and ordinances help to reduce the number of trips to haul solid waste, therefore reducing the amount of petroleum-based fuel, and also help to reduce the energy used to process solid waste.

2017 Power Strategic Long-Term Resource Plan

The 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost effective manner. The 2017 SLTRP re-examines and expands its

¹⁸⁵ American Geosciences Institute, *How Does Recycling Save Energy?*, www.americangeosciences.org/critical-issues/faq/how-does-recycling-save-energy, accessed May 7, 2018.

¹⁸⁶ CalRecycle, *History of California Solid Waste Law, 1985–1989*, www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm, accessed May 7, 2018.

analysis on the 2016 Final Power Integrated Resource Plan resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent RPS, advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification.

Recent updates include an updated 2016/17 Energy Efficiency Potential Study results with a target of 15 percent energy efficiency from 2017 through 2027, revised energy storage procurement targets, and completion of a distributed energy resources study titled, “Distributed Energy Resources Implementation Study (DERIS).” The 2017 SLTRP also includes numerous updates including new renewable projects, associated transmission upgrade cost and fuel cost assumptions, along with a host of other updates. The 2017 SLTRP uses system modeling tools to analyze and determine the long-term economic, environmental, and operational impact of alternative resource portfolios by simulating the integration of new resource alternatives within the existing mix of assets and providing the analytic results to inform the selection of a recommended case that is cost effective in reducing greenhouse gas emissions and maintains superior system reliability.

Early coal replacement and energy efficiency continue to be key strategies to reduce greenhouse gas emissions. Increasing the RPS to 55 percent by 2030 and 65 percent by 2036, including increased amounts of energy efficiency, local solar and energy storage, are other key initiatives to reduce greenhouse gas emissions. The 2017 SLTRP analyzed electrification of the transportation sector as a strategy to further reduce overall greenhouse gas emissions and to significantly reduce local emissions such as VOC, NO_x, CO, and PM_{2.5} that would result from electrifying local transportation and therefore recommends expanding existing programs to promote increased workplace and residential electric vehicle charging stations to support greater electric vehicle adoption while collaborating with regulatory agencies to develop mutually beneficial policies.

The 2017 SLTRP also includes a general assessment of the revenue requirements and rate impacts that support the recommended resource plan through 2037. While this assessment will not be as detailed and extensive as the financial analysis that was completed for 2015-16 fiscal year rate action, it clearly outlines the general requirements. As a long-term planning process, the 2017 SLTRP examines a 20-year horizon in order to secure adequate supplies of electricity.

Existing Conditions

Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep

the bulb on for 1 hour would be 100 Wh. If ten 100-W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion Wh.

LADWP provides electrical service throughout the City and many areas of the Owens Valley, serving approximately 4.0 million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes LADWP's service area north of Mulholland Drive, and the Metropolitan Planning District includes LADWP's service area south of Mulholland Drive. The Project Sites are located within LADWP's Metropolitan Planning District. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2016 IRP, LADWP has a net dependable generation capacity greater than 7,531 MW.¹⁸⁷ In 2017, LADWP's power system experienced an instantaneous peak demand of 6,432 MW.¹⁸⁸ Approximately 29 percent of LADWP's 2016 electricity purchases were from renewable sources, which is similar to the 25 percent statewide percentage of electricity purchases from renewable sources.¹⁸⁹

LADWP supplies electrical power to the Project Sites from electrical service lines located in the Project Sites' vicinity. Electricity is provided to the Project Sites through a network of utility poles that are operated and maintained by LADWP. Overhead electrical lines run north-south on South San Pedro Street and Crocker Street and east-west on East 6th Street adjacent to the Project Sites.

Existing Electricity Consumption at the Project Sites

Electricity is provided to the Project Sites through a network of utility poles that are operated and maintained by the LADWP. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. The existing parking lot uses do not consume any electricity. Based on CalEEMod calculations for the existing uses, the existing food service building consumes approximately 90,930 kilowatt-hours (kw-h) per year.¹⁹⁰

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the state, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and thus, resource availability is typically not an issue.

¹⁸⁷ LADWP, 2016 Final Power Integrated Resource Plan.

¹⁸⁸ LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.

¹⁸⁹ CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/, accessed on May 7, 2018.

¹⁹⁰ Refer to Appendix F.

Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel.

Natural gas is provided to the Project Sites by the Southern California Gas Company (SCG). SCG is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SCG serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.

SCG receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies. The traditional, southwestern United States sources of natural gas will continue to supply most of SCG's natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provides only a small share of SCG supplies due to the high cost of transport. Gas supply available to SCG from California sources averaged 122 million cf per day in 2015 (the most recent year for which data are available).¹⁹¹

SCG supplies natural gas to the Project Sites from natural gas service lines located in the Project Sites' vicinity. Natural gas is provided to the Project Sites through a network of underground pipelines that are operated and maintained by SCG.

Existing Natural Gas Consumption at the Project Sites

Natural gas is provided to the Project Sites through a network of underground pipelines that are operated and maintained by the Southern California Gas Company (SCG). The existing parking lot uses do not consume any natural gas. Based on CalEEMod calculations for the existing uses, the existing food service building consumes approximately 72,870 thousand British thermal units (kBtu) per year.¹⁹²

Transportation Energy

According to the CEC, transportation accounts for nearly 37 percent of California's total energy consumption in 2014.¹⁹³ In 2015, California consumed 15.1 billion gallons of gasoline and 2.82 billion gallons of diesel fuel.¹⁹⁴ Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.¹⁹⁵ However, the state is now working on developing flexible strategies to

¹⁹¹ *Southern California Gas Company, 2016 California Gas Report, July 2016.*

¹⁹² *Refer to Appendix F.*

¹⁹³ *CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017, p. 4.*

¹⁹⁴ *California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report.*

¹⁹⁵ *CEC, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.¹⁹⁶ According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 4.42 billion gallons of gasoline and 0.69 billion gallons of diesel fuel in 2015.¹⁹⁷

The existing food service building on Site 1 currently generates a demand for transportation-related fuel use as a result of vehicle trips to and from the site. The estimate of annual VMT associated with this use is 135,930 per year.¹⁹⁸ A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is approximately 20.4 miles per gallon (mpg) of gasoline and approximately 5.71 mpg of diesel.¹⁹⁹ Thus, the existing VMT associated with existing conditions of the Project Sites translates to the consumption of approximately 6,064 gallons of gasoline and approximately 2,143 gallons of diesel for transportation per year.²⁰⁰

Environmental Impacts

Thresholds of Significance

Appendix G of the State CEQA Guidelines

Appendix G of the CEQA Guidelines was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth “[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.”

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* (Thresholds Guide) states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and

¹⁹⁶ CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.

¹⁹⁷ CARB, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/

¹⁹⁸ Refer to the CalEEMod calculations in Appendix D that include existing VMT.

¹⁹⁹ Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>, accessed February 21, 2017.

²⁰⁰ Refer to Appendix F for detailed calculations.

- The degree to which the project design and/or operations incorporate energy- conservation measures, particularly those that go beyond City requirements.

Significance Threshold No. 1—With regard to energy use and consumption, a Project would result in significant impacts, if it would result in wasteful, inefficient, or unnecessary consumption of energy based on the evaluation of the following criteria:

1. The project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives.
7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.
8. Whether the Project conflicts with adopted energy conservation plans.

Significance Threshold No. 2—With regard to energy infrastructure, the Project would result in significant impacts if it would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Project Design Features

The following measures are included as part of the Project to reduce energy consumption:

- The Project shall not include natural gas-fueled fireplaces in the proposed residential units.
- Twenty percent of the Project’s provided vehicle parking spaces would be capable of accommodating EV charging stations, and an additional five percent would be wired as EV charging stations for immediate use.

- The Project would incorporate approximately 10,500 square feet of solar voltaic panes on building roof levels. Approximately 4,500 square feet would be included on Site 1, and approximately 6,000 square feet would be included on Site 2.
- Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems.
- Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.
- Materials selection for the building would be made taking into consideration energy conservation, durability, reduction of air pollutants and recycling. Products would be chosen for their resiliency and durability in order to help offset maintenance costs. Finish materials would have no or low-VOC compounds, in order to help reduce the introduction of harmful chemicals into the building. Materials would be chosen for their pre/post-consumer content to reduce the amount of virgin material being used and reduce amount of waste.
- Plants and their substrate would act as a natural water filter reducing the contamination of water that leaves the site. Low-maintenance native and adapted plants would be chosen for landscaped areas and will take into consideration creating mini-ecosystems with habitats for birds and beneficial insects in order to increase the biodiversity at the site. The landscaped area could reduce the urban heat island effect and smog as the plants act as a natural air filter and absorb heat versus reflecting it. Pervious paving areas may also be used to reduce the amount of hardscape, decrease storm water run-off, and cool the microclimate of the building.
- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gpm or less.
- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf

- Drought-tolerant plants – 50 percent of total landscaping

Analysis of Project Impacts

Significance Threshold No. 1: Would the Project result in wasteful, inefficient, or unnecessary use of energy based on the stated criteria?

The analysis below considers the eight criteria identified in the Thresholds of Significance subsection above to determine whether this significance threshold would be exceeded.

- 1) *The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.*

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance and removal activities).

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping, and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Sites, construction worker travel to and from the Project Sites, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown on Table 6-73 and as discussed further below, Project construction would consume approximately a total of 1,182 kWh of electricity, 330,664 gallons of gasoline, and 32,892 gallons of diesel. Project construction is expected to be completed by 2025.

**Table 6-73
Summary of Energy Use During Project Construction**

Fuel Type	Quantity
Electricity	
Water Consumption	1,182 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power	N/A
Total Electricity	1,182 kWh
Gasoline	
On-Road Construction Equipment	330,664 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	330,664 gallons
Diesel	
On-Road Construction Equipment	22,286 gallons
Off-Road Construction Equipment	10,606 gallons
Total Diesel	32,892 gallons
Total Petroleum-Based Fuel	363,556 gallons
<i>kWh = kilowatt-hours</i>	
<i>Detailed calculations are included in Appendix P.</i>	

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Sites by LADWP and would be obtained from the existing electrical lines that connect to the Project Sites. This would be consistent with suggested measures in the Threshold Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators.

As shown on Table 6-73, a total of approximately 1,182 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated construction electricity usage represents approximately 0.05 percent of the estimated net annual operational demand, which is discussed below, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Sites during construction.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction.

Transportation Energy

The petroleum-based fuel use summary provided above on Table 6-73 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions outlined in Appendix P of this SCEA. As shown, on- and off-road vehicles would consume an estimated 330,664 gallons of gasoline and approximately 32,892 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.007 percent of the 2017 annual on-road gasoline-related energy consumption and 0.005 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown on Table 6-74, the Project's net demand for electricity would be approximately 2,238,713 kWh per year. As shown on Table 6-75, the Project's net demand for natural gas would be 3,361,259 kBtu per year. As shown on Table 6-76, the Project's net demand for gasoline and diesel would be 192,464 and 68,006 gallons per year, respectively.

**Table 6-74
Project Estimated Electricity Demand**

Land Use	Size	Total (kw-h/yr)¹
Residential	685 du	1,512,700
Commercial	48,043 sf	265,329
Enclosed Parking	93,452 sf	467,347
Project Total		2,245,376
Less Existing		6,663
Net Total		2,238,713
<i>du = dwelling unit sf = square feet kw-h = kilowatt-hour yr = year</i> ¹ <i>Calculated via CalEEMod. Refer to Appendix D.</i> <i>Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.</i>		

**Table 6-75
Project Estimated Natural Gas Demand**

Land Use	Size	Total (kBtu/yr)¹
Residential	685 du	3,520,870
Commercial	48,043 sf	183,259
Enclosed Parking	93,452 sf	0
Project Total		3,704,129
Less Existing		72,870
Net Total		3,631,259
<i>du = dwelling unit sf = square feet kBtu = 1,000 British Thermal Units yr = year</i>		
¹ <i>Calculated via CalEEMod. Refer to Appendix D.</i>		
<i>Note: SCG does not provide or comment on generation rates to provide an estimate of demand.</i>		

**Table 6-76
Estimated Project Transportation Petroleum-Based Fuel**

Fuel Type	Gallons Per Year
Gasoline	
Project	198,528
<i>Less Existing</i>	<i>6,064</i>
Net Total Gasoline	192,454
Diesel	
Project	70,148
<i>Less Existing</i>	<i>2,142</i>
Net Total Diesel	68,006
Total Fuel	260,470
<i>Detailed calculations are included in Appendix P.</i>	

Electricity

With compliance with 2016 Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,238,713 kWh per year (refer to Table 6-75). In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.²⁰¹ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate approximately a total of 10,500 square feet of solar voltaic panes on building roof levels and other active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs.

²⁰¹ CEC, *Utility Annual Power Content Labels for 2016*, www.energy.ca.gov/pcl/labels/.

Based on LADWP’s 2017 STLRP, LADWP forecasts that its total energy sales in the 2024-2025 fiscal year (the Project’s buildout year) will be 23,286 GWh of electricity.²⁰² As such, the Project-related net increase in annual electricity consumption of 2,238,713 kWh per year would represent approximately 0.009 percent of LADWP’s projected sales in 2024-2025.

Natural Gas

With compliance with 2016 Title 24 standards and applicable requirements of the City’s Green Building Code, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 3,631,259 kBTU per year, or approximately 9,949 kBTU per day (9,753 cf per day).²⁰³ Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG’s planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project’s buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG’s planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City’s Green Building Code to reduce energy usage and those included as PDF-1.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Sites. As noted previously, the Project Sites are located in an HQTAs designated by SCAG that indicates that the Project Sites are an appropriate site for increased density and employment opportunities from a “smart growth” regional planning perspective. As discussed in response to Checklist Question 16(a) (Transportation/Traffic) of this SCEA, extensive public bus and rail transit service is provided within the Project study area. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello Bus Lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold lines also are provided in proximity to the Project Sites. Metro’s nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted previously, the Project Sites are located less than 1.0 mile from Metro’s Regional Connector 1st Street portal, which is currently under construction. Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 95 (Rider’s Paradise) out of 100 for the Project Sites.²⁰⁴ The existing transit services in the vicinity of the Project

²⁰² 2017 Power Strategic Long-Term Resource Plan, December 2017, LADWP, Appendix A.

²⁰³ $kBTU = 1,000 BTU$. One BTU equals 1,020 cubic feet. $3,631,259 \times 1,000 = 3,631,259,000 BTU$. $13,190,078,000 BTU / 1,020 cf = 3,560,057 cf$. $3,560,057 / 365 days = 9,753 cf/day$.

²⁰⁴ Refer to <http://www.walkscore.com/>, which generates the transit score for the project site. Walk Score calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for using transit service.

Sites would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended mitigation measures, and would reduce vehicle trips to the Project Sites and VMT to the Project Sites. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. Qualifying measures applicable to the Project include the following:

- **Increase Density (LUT-1):** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. On Site 1, the Project would increase the density from a 7,000-square-foot food service building and surface parking to 382 dwelling units, 25,493 square feet of philanthropic institution, and 2,250 square feet of commercial retail use. On Site 2, the Project would increase the density from a surface parking lot to 303 dwelling units, 17,100 square feet uses. Both sites are in an area rich in transit services.
- **Increase Diversity of Urban and Suburban Developments (Mixed-Uses) (LUT-3):** The Project would introduce new residential and commercial uses on the Project Sites. The Project would co-locate complementary commercial and residential land uses in proximity to other existing off-site commercial and residential uses. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and VMT by encouraging non-automotive forms of transportation (i.e. walking and biking), which would result in corresponding reductions in transportation-related emissions.
- **Increase Destination Accessibility (LUT-4):** The Project Sites are located in an area that offers access to multiple nearby retail and entertainment destinations. In addition, the Project Sites are located in Downtown Los Angeles, a primary job center, also easily accessible by public transportation. The access to multiple destinations in proximity to the Project Sites would reduce vehicle trips and VMT and would encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- **Increase Transit Accessibility (LUT-5):** The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. The Project would also provide adequate bicycle parking spaces for residential and commercial uses to encourage utilization of alternative modes of transportation.

- **Improve Design of Development (LUT-9):** The Project would include improved design elements including developing ground floor retail, open space, and improved streetscape which would enhance walkability in the Project Sites' vicinity. The Project would also locate a development in an area with a high level of street accessibility and connectivity.
- **Provide Pedestrian Network Improvements (SDT-1):** Providing links and minimizing barriers to the Project Sites with existing or planned external streets would encourage people to walk instead of drive. The Project would link to the existing off-site pedestrian network, including existing off-site sidewalks, to encourage and increase pedestrian activities in the area that would further reduce VMT and associated transportation-related emissions. Furthermore, the Project would result in an improved and aesthetically appealing streetscape that would promote pedestrian activity, particularly between the 0.7 miles from the Purple/Red line station at Pershing Square to the Project Sites.
- **Traffic Calming Measures (SDT-2):** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Sites are equipped with sidewalks, and approximately many of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

When accounting for the measures that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would be approximately 198,528 gallons of gasoline and 70,148 gallons of diesel per year, or a total of 260,470 gallons of petroleum-based fuels annually.

Summary of Energy Requirements and Energy Use Efficiencies

Appendix G of the CEQA Guidelines recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data was calculated based on CAPCOA guidelines. The calculations also took into account energy efficiency measures such as Title 24, CalGreen and vehicle fuel economy standards. Tables 6-75 through 6-77 provide a summary of Project construction and operational energy usage. During Project construction activities, a total of 1,182 kWh of electricity would be consumed along with approximately 363,556 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 2,238,713 kWh of electricity, 3,631,259,150 kBTU of natural gas, and 260,470 gallons of transportation fuel would be consumed on an annual basis.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction

period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 0.05 percent of the estimated net annual operational demand and would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.007 percent of gasoline usage and 0.005 percent of diesel usage within Los Angeles County, respectively.²⁰⁵ As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated previously, based on LADWP's 2017 STRLP, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity. LADWP forecasts that its total energy sales in the 2024–2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity. As such, the Project-related net increase in annual electricity consumption of 2,238,713 kWh per year would represent approximately 0.009 percent of LADWP's projected sales in 2024–2025.

As stated above, the Project's estimated net increase in demand for natural gas is 3,631,259 kBTU per year (3,560,057 cf per year), or approximately 9,949 kBTU per day (9,753 cf per day). Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG's planning area.

At buildout, the Project would consume a net total of 192,454 gallons of gasoline and 68,006 gallons of diesel per year, or a net total of 260,470 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.005 percent of the 2017 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

In sum, energy consumption during Project operations would be relatively negligible, and energy requirements would be within LADWP's and SCG's service provision.

²⁰⁵ Refer to County fuel calculations in Appendix P.

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all time high peak of 6,432 MW on August 31, 2017.²⁰⁶ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.²⁰⁷ Under peak conditions, the Project would consume 4,538,308 kWh on an annual basis, equivalent to 255 kW. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.002 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.²⁰⁸ Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

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

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage during Project operations presented on Tables 6-74 through 6-76 would comply with 2016 Title 24 standards and applicable 2016 CalGreen Code requirements and the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Sites are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

²⁰⁶ LADWP, *2017 Retail Electric Sales and Demand Forecast*. p. 6.

²⁰⁷ *Ibid.*

²⁰⁸ *Ibid.*

5) *Effects of the Project on Energy Resources*

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2017 STLRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.²⁰⁹ According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.²¹⁰ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.²¹¹ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in the Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.²¹² This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Sites' location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal

²⁰⁹ *California Gas and Electric Utilities, 2016 California Gas Report, 2016.*

²¹⁰ *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed May 7, 2018.*

²¹¹ *BP Global, Oil reserves, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed May 7, 2018.*

²¹² *CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.*

solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas and was found beneath the Project Sites, it is not available on the Project Sites in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Sites are not identified as an area with wind resource potential.²¹³

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

The Project's high-density design and proximity to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing associated VMT. The design of the Project, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also would encourage non-automotive forms of transportation such as walking or biking to destinations. In addition, extensive public bus and rail transit service is provided within the area of the Project Sites and provide regular service intervals of 15 minutes during the peak hours. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello bus lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. As shown previously on Table 6-67 (refer to Response to Checklist Question 16[a] [Transportation/Traffic]), due to the Project's mixed-use nature, the Project would result in a reduction of approximately 177 daily trips, resulting in an associated reduction of VMT. Therefore, the Project would encourage the use of efficient transportation alternatives.

- 7) *The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements*

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code.

²¹³ CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, <https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3D%26qCw3hR%255Bv%255D%3D%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&IR=0&mC=36.416862115300304%2C-120.421142578125&zL=8>, accessed May 7, 2018.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

8) *Whether the Project conflicts with adopted energy conservation plans.*

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), SCAG's 2016-2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016-2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2016-2040 RTP/SCS. Most notably, the Project would be a mixed-use development consisting of 685 dwelling units, 25,493 square feet of philanthropic institution uses, 5,450 square feet of retail uses, and 17,100 square feet of office uses, located in "Skid Row," which is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well served by existing public transportation, including Metro bus lines and rail lines. This is evidenced by the Project Sites' location within a designated HQTAs. The introduction of new housing and job opportunities within an HQTAs, as proposed by the Project, is consistent with numerous policies in the 2016-2040 RTP/SCS related to locating new housing and jobs near transit. The 2016-2040 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020, an 18 percent decrease in VMT by 2035, and a 21 percent decrease in VMT by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in VMT by 2040 (an additional 3 percent reduction in the 5 years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2016-2040 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion Regarding Significance Threshold No. 1

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use under Significance Threshold No. 1 would be less than significant during construction and operation.

Significance Threshold No. 2: Would the Project result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction***Electricity***

As discussed above, construction activities at the Project Sites would require minor quantities of electricity for lighting, power tools, and other support equipment. Heavy construction equipment would be powered with diesel fuel.

During Project construction activities, electricity usage represents 0.05 percent of the estimated net annual Project operational demand, which as described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for. Moreover, construction electricity usage would replace the existing electricity usage at the Project Sites during construction since the existing on-site uses, which currently generate a demand for electricity would be removed. As existing power lines are located in the vicinity of the Project Sites, temporary power poles may be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the project during construction or demolition. Therefore, the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. Project contractors would notify and coordinate with SCG to identify the locations and depth of all existing gas lines and

avoid disruption of gas service to other properties. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Sites. Since the Project Sites are located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Sites. Construction impacts associated with the installation of natural gas connections would be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SCG to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

Electricity

As shown on Table 6-74, the Project's operational electricity usage would be 2,238,713 kWh per year, which is approximately 0.009 percent of LADWP's projected sales in 2024-2025. In addition, during peak conditions, the Project would represent approximately 0.008 percent of the LADWP estimated peak load. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area. Therefore, during Project operations, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Natural Gas

As stated above, the Project's estimated net increase in demand for natural gas is 3,631,259 kBTU per year (3,560,057 cf per year), or approximately 9,949 kBTU per day (9,753 cf per day). Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG's planning area. Therefore, it is anticipated that SCG's existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.

Conclusion Regarding Significance Threshold No. 2

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution

infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, Project impacts related to energy infrastructure capacity would be less than significant during construction and operation.

Cumulative Impacts

Significance Threshold No. 1 (Use and Consumption of Energy)

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in on Table 2-2 in Section 2 (Project Description), there are 161 related projects located within the vicinity of the Project Sites. The geographic context for the cumulative analysis of electricity is LADWP's service area and the geographic context for the cumulative analysis of natural gas is SCG's service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of countywide consumption. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. As stated previously, LADWP forecasts that its total energy sales for the 2024-2025 fiscal year (the Project buildout year) will be 23,286 GWh of electricity. Based on the Project's estimated net new electrical consumption of 2,238,713 kWh per year, the Project would account for approximately 0.009 percent of LADWP's total projected sales for the Project's buildout year. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. Furthermore, as with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CalGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and thus, would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SCG's service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. As stated previously, based on the 2016 California Gas Report, the CEC estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately

0.0003 percent of the forecasted 2021 consumption in SCG's planning area. SCG's forecasts take into account projected population growth and development based on local and regional plans. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SCG's service area. Furthermore, future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CalGreen and state energy standards under Title 24, and incorporate mitigation measures, as necessary. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and thus, would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a net total of 192,454 gallons of gasoline and 68,006 gallons of diesel per year, or a total of 260,470 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.005 percent of the 2017 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the state has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT, which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions.

Furthermore, as discussed previously, the Project would be consistent with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS. Specifically, the Project would be a mixed-use development consisting of 685 dwelling units, 25,483 square feet of philanthropic institution uses, 5,450 square feet of retail uses, and 17,100 square feet of office uses, located in "Skid Row," which is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well served by existing public transportation, including Metro bus lines and rail line. The Project also would introduce new housing and job opportunities within an HQTAs, which is consistent with numerous policies in the 2016-2040 RTP/SCS related to locating new jobs near transit. These features would serve to reduce VMT and associated transportation fuel consumption. By its very nature, the 2016-2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Since the Project is consistent with the 2016-2040 RTP/SCS, its

contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel would not be cumulatively considerable and thus, would be less than significant.

Significance Threshold No. 2 (Infrastructure Capacity Analysis)

Electricity

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 STLRP, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 STLRP takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the area of the Project Sites. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and thus, would be less than significant.

Natural Gas

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SCG occur as needed. It is expected that SCG would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area, including the Project and related projects also served by the existing SCG infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, the Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and thus, would be less than significant.

19. MANDATORY FINDINGS OF SIGNIFICANCE

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

Less Than Significant With Mitigation Incorporated. As discussed under Checklist Topic 4 (Biological Resources), with implementation of mitigation, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. As discussed under Checklist Topics 5 (Cultural Resources), with implementation of mitigation, the Project would not

eliminate important examples of the major periods of California history or prehistory. Therefore, with implementation of the mitigation measures outlined in Section 6 (Sustainable Communities Environmental Impact Analysis) of the SCEA, Project impacts related to these issues would be less than significant.

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

Less Than Significant Impact. Cumulative impacts for each checklist topic listed in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA have been addressed. As discussed in this section, the Project would not contribute a cumulatively considerable impact to any cumulative impacts outlined in this section. Therefore, cumulative impacts would be less than significant

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Topic 3 (Air Quality), Checklist Question Topic 8 (Hazards and Hazardous Materials), Checklist Topic 10 (Land Use and Planning), Checklist Topic 12 (Noise), and Checklist Question 16 (Transportation/Traffic), with implementation of mitigation, the Project’s construction-related noise impacts would be less than significant. All other potential impacts are less than significant without mitigation. Therefore, with implementation of the mitigation measures outlined in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA, the Project would not have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly.