

Sustainable Communities Environmental Assessment

V. SCEA Initial Study Checklist

1. Aesthetics

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

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

Less Than Significant Impact. A significant impact would occur if a project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is approximately 2.14 acres (93,278 square feet) in size and is currently a vacant paved lot. The Project Site is relatively flat and is comprised of one oblique, rectangle parcel of land bounded on three sides by public streets. The existing viewshed at the Project Site is defined by existing urban development with residential structures of varying mass, height, and design.

There are no views of mountains, the beach or Pacific Ocean, or other such similar scenic vistas available from the Project Site or the streets immediately surrounding the Project Site. A significant impact occurs only when a proposed project adversely affects the public view of a scenic vista and, therefore, impacts to private views are not considered to be significant and no

further analysis is required. Therefore, the Project would result less than significant impacts on scenic vistas.

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

Less Than Significant Impact. A significant impact would occur if scenic resources within a State scenic highway would be damaged and/or removed by development of a project. There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.¹ There are also no City-designated scenic highways in the Project Site vicinity.² Therefore, the Project would have a less than significant impact on scenic resources or historic buildings within a State scenic highway.

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

Less Than Significant Impact. A significant impact may occur if, in a non-urbanized area, the project would substantially degrade the existing visual character or quality of the site and its surroundings, or if, in an urbanized area, the project would conflict with applicable zoning or regulations governing scenic quality.

The Project is located in a highly urbanized area in the Venice community of the City of Los Angeles; therefore, the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would involve the redevelopment of a currently vacant lot with a total of 98 residential apartment units, 68 of which will be reserved for seniors and 30 units that will accommodate families. The Project would provide approximately 19,951 square feet of open space. The senior housing units would be provided in one-to two three-story buildings (“Senior Building”) and the family units would be provided in several two-story units (“Family Units”). The proposed building would reach a height of approximately 40.5 feet at the tallest portion of the three-story building. The proposed one- and two-story buildings would be up to 25 feet high. Thus, the Project would result in a change in the visual character of the Project Site. The Project Site is surrounded on three sides by residential development. To the north and west of the Project Site is a neighborhood referred to as the “Oxford Triangle” which is primarily developed with single family residential uses and zones R1-1. To east, the Project Site is adjoined by several multi-story, multi-family residential and mixed-use developments located on sites zoned C4(OX)-2D. The Project is designed with one, two- and three-story structures to provide transitional heights and setbacks

¹ California Department of Transportation, *California Scenic Highway Mapping System, Los Angeles County*, website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm, accessed: April 2019.

² City of Los Angeles Department of City Planning, *Mobility Plan 2035, Citywide General Plan Circulation System, Map A3 – West Subarea*.

that meet or exceed those of the adjacent single family homes. The semi-subterranean parking garage incorporates landscaping and screening so vehicles are not visible from adjacent uses.

Zoning Consistency

The Project Site is within the Venice Coastal Zone Specific Plan (VCZSP), in the Oxford Triangle Subarea, the Oxford Triangle Specific Plan (OTSP), and the Los Angeles Coastal Transportation Corridor Specific Plan (LACTC).

The Los Angeles Municipal Code (LAMC) establishes the zoning for the Project Site as [Q]PF-1XL; the Project Site is designated for Public Facilities land uses by the Venice Community Plan. The Project Site was previously developed and operated as a maintenance yard for the City of Los Angeles Bureau of Sanitation. All buildings and on-site structures were demolished in 2016. The Property has remained vacant since 2016.

The Venice Community Plan cites a footnote with Public Facilities zones stating, “General Plan Footnote 8: The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zone(s) most consistent within 500 feet of the property boundary and still be considered consistent with the adopted plan.”

This footnote is applicable to the Project Site as the City has identified the site as a surplus property that may be utilized for private purposes. However, the Project does not involve a change of zone or sale of land at this time. All development on the Project Site will be accomplished through a Public-Private Joint Development and Agreement that will be negotiated by the City and the Applicant.

The Project includes a request for a Conditional Use Permit, pursuant to LAMC Section 12.24 U.21, to permit any joint public and private development uses more intensive than those permitted in the most restrictive adjoining zones. The phrase “adjoining zones” refers to the zones of properties abutting, across the street or alley from, or having a common corner with, the Project Site.

The Project includes 98 residential units in the [Q]PF-1XL zone. The most restrictive adjoining zone, located across Oxford Avenue to the west of the Project Site, is classified as R1-1 by the underlying zoning and the Oxford Triangle Specific Plan. To the east of the Project Site, the C4(OX)-2D zone permits the development of multi-family uses with increased density, FAR, and height in accordance with the standards of the R3 zone, per the provisions of the Oxford Triangle Specific Plan.

In an effort to meet the intent of the OTSP and the VCZSP, the Project proposes a multi-family residential use which is less intensive than uses and area standards permitted by the adjacent commercial zone. While the underlying zoning clearly classifies the property within the PF zone,

the OTSP and the VCZSP do not put forth explicit standards for residential development on a site designated for Public Facilities. As such, the Project proposes a blend of development standards including density, FAR, setbacks. In most instances, these area standards are significantly less than the allowances which would be permitted in the adjacent C4(OX)-2D zone.

The Project's proposed building height would reach approximately 40.5 feet at the tallest portion of the three-story building. Existing buildings that immediately surround the Project Site range from two to five stories high. The Project would introduce a building that is taller than some of the surrounding buildings and shorter than others.

Height

Per the VCZSP, the height of each building is measured from the centerline of the lot frontage along Princeton Drive. According to a survey completed by a civil engineer, the elevation at this point is 10.03 feet. With a maximum absolute height of 40.5 feet, the maximum permitted elevation of any building on the lot is 50.5 feet. The highest measurable point within the Project occurs at the community building tower, at which point the elevation measures 50.5 feet. The remaining structures (eight family unit buildings and the senior building) range from one to three stories, at a maximum height of 39.25 feet. The Project will provide ten units, (ten percent) of the total Project, as very-low income units, as defined by HSC § 50053(b)(2) for purposes of the Density Bonus and would qualify for on-menu and off-menu incentives as set forth in the State Density Bonus law (California Government Code Section 65915) and the City's density bonus ordinance (LAMC Section 12.22-A,25). The on-menu incentive that is being requested is per LAMC 12.22-A.25(f)(5) for a percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. The project requests a 35 percent increase in height for a total height of 40.5 feet, in lieu of the otherwise permitted 30-foot height limit per the Venice Coastal Zone Specific Plan and 1XL Height District.

Floor Area Ratio (FAR)

While the FAR is not explicitly prescribed by the [Q]PF-1XL zone, the Project has been designed to blend compatibly with both adjoining zones, R1-1 and C4(OX)-2D. The maximum FAR in the commercial zone, per the OTSP, is 3.0 to 1 for a multi-family development. The Project will observe a maximum FAR of 1.35:1.

Setbacks

Thatcher Avenue serves as the functional frontage of the Project; however, the Family Units would be dispersed along Princeton Drive and Oxford Avenue. With entrances and patios facing the interior, each family unit has windows along the respective streets and the buildings are oriented to provide an appropriate setback from the public right-of-way and the appearance of a front façade. The street facing frontages have been designed to mirror the coherence of the adjacent single-family residential buildings, while providing architectural interest through varied materials and varied rooflines.

The Project provides varying setbacks that provide distance from the adjacent uses, while still utilizing the lot area efficiently, as follows:

Princeton Drive (front): 8 feet
 Oxford Avenue (side): 10 feet
 Thatcher Avenue (side): 10 feet
 Harbor Crossing Lane (rear): 10 feet

Other Regulations Governing Scenic Quality

Venice Coastal Zone Specific Plan (VCZSP)

The VCZSP became effective on January 19, 2004, governing portions of Venice that are located within the Coastal Zone. The VCZSP designates the Property as [Q]PF-1XL with Public Facility Land Uses, per the underlying zoning and land use designation, within the Oxford Triangle Subarea. Formal adoption of the VCZSP by the Coastal Commission as a Certified Local Coastal Program is still pending. The following Development Standards of the VCZSP are applicable to the Project, and the Project's compliance with those standards is discussed below.

Section 9

B. HEIGHT. *Height shall be measured as the vertical distance from ground level, as specified below for each subarea, to the highest point of the roof or parapet wall, excluding roof deck railings that do not exceed 36 inches and are of an open design, unless specified otherwise in this Section.*

1. *For the Lagoon Lots in the Silver Strand and Ballona Lagoon West Bank Subareas, height shall be measured from the average existing natural grade.*

2. *For lots in the Venice Canals Subarea, height shall be measured from the elevation of the centerline of the adjacent alleyway measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building.*

3. *For all other lots, height shall be measured from the centerline of the street or alley or walk adjacent to the front lot line measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building. For through lots, height shall be measured from the centerline of whichever adjacent street is the lowest in elevation. In any case involving a Grand Canal Lot, height shall be measured from the elevation of the Grand Canal Esplanade sidewalk.*

As described above, the Project complies with Section 9-B.3; the height of each building is measured from the centerline of the lot frontage along Princeton Drive. According to a survey completed by a civil engineer, the elevation at this point is 10.03 feet. With a maximum absolute height of 40.5 feet, the maximum permitted height of any building on the lot is 50.5 feet. The highest measurable point within the Project occurs at the community building tower, at which point the elevation measures 50.5 feet. The Project complies with this requirement.

Section 10. LAND USE AND DEVELOPMENT REGULATIONS FOR SUBAREAS

In addition to the regulations in Section 9, the following regulations shall apply within each of the specified subareas in Sub-sections A-H below.

F. OXFORD TRIANGLE

1. Density. Commercial Zones. No residential Venice Coastal Development Project shall exceed a density that is allowed in the R3 zone, except as permitted by the Oxford Triangle Specific Plan.

The Project is not located in a Commercial Zone, therefore this provision does not apply. The underlying zone, [Q]PF-1XL, does not inherently have a prescribed density allowance or limitation. Pursuant to the requested Conditional Use Permit, the Project density has been designed to be compatible with the adjacent uses and zones. Per an R3 density calculation of 1 dwelling units for every 800 square feet of lot area, the site would permit a total of 116.5 or 117 units. In an effort to maintain compatibility with the neighborhood, the Project proposes a total density of 98 units. This density maximum is achievable through the Conditional Use Request for uses more intense than those permitted in the nearest adjoining zone (R1-1).

2. Height.

a. R-1 Residential Zone. Venice Coastal Development Projects with a Flat Roof Shall not exceed a maximum height of 25 feet; Venice Coastal Development Projects with a Varied Roofline shall not exceed a maximum height of 30 feet.

b. C2 Commercial Zone. Venice Coastal Development Projects shall not exceed a maximum height of 30 feet on all C2 zoned lots.

Property is specified with in the Oxford Triangle Area that regulates Maximum Building Height for all lots within the Exhibit 13 “Height – Subarea: Oxford Triangle” boundaries. While the Project is not located in the R1-1 or C2 commercial zone, this map indicates that the Project is subject to the height limitations. So, as a Residential project, the Project will observe a base height of 30 feet with a Varied Roofline. The property is zoned [Q]PF-1XL, and subject to the height limitations of the 1XL height district. The base height of 30 feet is consistent with the height district. The Project is requesting an increase in height, permitted through an “on-menu” incentive in accordance with SB1818 Density Bonus, which would provide an additional 10.5 feet in allowable height, for a total height of 40.5 feet necessary to accommodate the provision of affordable housing units. The Project complies with this requirement with a maximum height of 40.5 feet. All height measurements are taken from the elevation of the fronting right-of-way (Princeton Drive), as dictated by Section 9B of the VCZSP.

Oxford Triangle Specific Plan

The Property is located within the Oxford Triangle Specific Plan (OTSP). The OTSP became effective on July 31, 1987 and was subsequently corrected by ORD 170,155, effective January 14, 1995. The OTSP governs the area bounded by Washington Boulevard to the north, Admiralty

Way to the south, and Lincoln Boulevard to the west. The OTSP established a zoning designation of R1-1 for the Property.

After the adoption and subsequent correction of the OTSP, the Property was rezoned from R1-1 to [Q]PF-1-XL by ORD 170,999, effective May 22, 1996. This zone change established the current zoning designation for the Property. The “Q” Condition in the zoning designation for the Property provides that the “subject property shall be subject to all conditions imposed under the City Plan Case No. 2836.” Those conditions require trees plantings on the southwesterly perimeter to screen the City’s maintenance yard activities from the residential properties located across Oxford Street. These conditions will not apply to the Project, since it is not a City maintenance yard.

Most of the development standards in the OTSP regulations relate solely to commercially zoned property and therefore do not apply to the Project.

Los Angeles Coastal Transportation Corridor Specific Plan

The Los Angeles Coastal Transportation Corridor Specific Plan (LACTC) provides an outline for development within the Specific Plan Area to encourage alternate modes of transportation (i.e., bicycle, mass transit, etc.) and to mitigate the impact of new commercial and industrial development within the corridor and coastal area. Under the LACTC, a Project is defined as any construction, addition, conversion, change of use, or use of land on a lot in the C, M, or P Zones, which requires the issuance of a building, grading or foundation permit, and which results in an increase in the number of vehicle trips as determined by the Department of Transportation. The Project does not include the development of commercial or industrial development in the C, M, or P zones, therefore does not qualify as a project under the LACTC.

Therefore, the Project would not conflict with applicable zoning or regulations governing scenic quality. Accordingly, impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the development introduces new sources of light or glare on or from a project site which adversely affect day or nighttime views in the area.

Light

The Project is located in a well-lit area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures which passes through windows), all of which are common to densely populated areas. Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, thus, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As land uses surrounding the Project Site are already lit from existing development in the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would have the potential to alter lighting patterns in the area of the Project Site as compared with the existing structure and surface parking lot. Night lighting for the Project would be provided to illuminate building entrances, driveways, and for security. Although the amount of light emanating from the Project would represent an increase over current light levels, the Project would comply with LAMC Section 12.21.A.5(k) (Design of Parking Facilities – Lighting), which requires parking area lighting to reflect away from any street and any adjacent premises; LAMC Section 14.4.4.E (Sign Illumination Limitations), which prohibits sign lighting from producing a light intensity of greater than three foot candles above ambient lighting as measured from the nearest residentially zoned property; and LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot candles, or from receiving direct glare from the light source.³

Additionally, headlights from vehicles entering and exiting the Project's semi-subterranean parking structure from the intersection of Thatcher Avenue and Princeton Drive at night would be an increased source of light at the Project Site due to the greater intensity of use at the site. Light from vehicle headlights would not directly shine upon any nearby light-sensitive land use for any substantial amount of time as vehicles would be traveling north-south along Thatcher Avenue and would then turn into the parking garage.

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. Even so, adherence to the City's regulatory compliance measures, including LAMC Sections 12.21.A.5(k), 14.4.4.E, and 93.0117, and design standards would require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, nor from above so as to minimize light trespass. Thus, the Project would result in less than significant impacts regarding light.

Glare

Glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the urbanized nature of the region, which results in a concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include vehicles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area.

The Project would incorporate both solid and glass surfaces. Exterior building materials would use various non-reflective material designed to minimize the transmission of glare from building. Compliance with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor areas of residential units from being illuminated by more than two foot

³ *Direct glare, as used in LAMC Section 93.0117, is a glare resulting from high luminances or insufficiently shielded light sources that is in the field of view.*

candles, or from receiving direct glare from the light source, would ensure glare impacts are not significant. Thus, the Project would result in less than significant impacts regarding glare.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects (see Section II, Project Description) with respect to the topics listed in the aesthetics analysis above, including scenic vistas, scenic resources within a designated scenic highway, scenic quality, and light and glare.

The nearest related project to the Project Site is related project LA10, which consists of 65 multi-family residential units at 13488 W. Maxella Avenue (see Figure II-12 in Section II, Project Description, of this document). LA10 would be approximately 0.28 miles east of the proposed Project and similar in project type. Potential views of this and the other related projects are obstructed by the existing built environment and are not located within the field of view of the Project Site. The development of the related projects would occur within the existing built environment and could combine to change the visual character of the area. During construction, each project could create unsightly debris and soils stockpiles, staged building materials and supplies, and construction equipment, as part of grading, excavation, and building phases of the projects. The Project would not contribute to a cumulatively considerable impact during construction.

As discussed above, the Project area does not contain a designated scenic corridor and there are no designated scenic highways in the vicinity. Therefore, the Project would not combine with the related projects to have a cumulative impact on these types of scenic resources.

Additionally, the related projects and additional future development are reasonably expected to occur in accordance with adopted plans and regulations, such as LAMC Section 12.22-A,23(a)(5), and be subject to the review and approval of the Department of City Planning (DCP) prior to issuance of grading and building permits. Any approvals granted to future development projects, including the listed related projects in Section 2.4, Related Projects, are reasonably anticipated to provide landscape and signage that would be aesthetically compatible with the surrounding neighborhood. As discussed above, the Project would result in less than significant impacts to aesthetics and would improve the existing visual character and quality of the Project Site. Considering all of the above, the cumulative aesthetic impact would be less than significant and no mitigation measures are required.

2. Agriculture and Forest Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) 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. A significant impact may occur if a project were to result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The vacant Project Site is located in a developed area of the City; prior to 2016 it was used for public facilities, namely a Bureau of Sanitation maintenance yard. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project Site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁴ Thus, Project implementation would not result in the loss of State-designated Farmland. Therefore, no impacts would occur and no mitigation measures are required.

⁴ State of California Department of Conservation, Division of Land Resource Protection, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016*, published July 2017, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed: April 2019.

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

No Impact. A significant impact may occur if a project were to conflict with land zoned for agricultural use or under a Williamson Act contract. The Project Site is zoned [Q]PF-1XL (Public Facilities – 1XL Height District). Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor surrounding area are under a Williamson Act contract.⁵ Therefore, no impacts would occur and no mitigation measures are required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12222(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. A significant impact may occur if a project were to result in a conflict with land zoned 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)). There are no forest or timberland resources on this fully developed site located in an urbanized part of the City.

In the City, forest land is a permitted use in areas zoned OS (Open Space); the City does not have specific zoning for timberland or timberland production. The Project Site is zoned [Q]PF-1XL (Public Facilities – 1XL Height District). The Project Site is not zoned for forest land, timberland, or timberland production land uses. Therefore, no impacts would occur and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project were to result in the loss of forest land or conversion of forest land to non-forest use. The vacant Project Site is located in a developed area of the City; prior to 2016 it was used for public facilities, namely a Bureau of Sanitation maintenance yard. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. Therefore, no impacts would occur and no mitigation measures are required.

⁵ *State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act FY 2015/2016, published 2016, website: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf, accessed: April 2019.*

- 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 or conversion of forest land to non-forest use?**

No Impact. A significant impact may occur if a project indirectly results in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The Project Site is previously developed and located in an urbanized area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the analysis above, including State-designated farmland, agricultural uses, and forest land uses. The Project Site and related projects are located in a developed area of the City, and none of these respective sites contain State-designated farmland.⁶ Neither the Project Site nor the related projects are located on land currently used as agriculture or forest land, or on land zoned for agricultural uses or forest land, timberland, or Timberland Production. Thus, neither the Project nor the related projects would result in the conversion of existing agricultural uses or zoning to a non-agricultural use, nor result in the loss of forest land, timberland, Timberland Production or zoning, or the conversion of forest land to non-forest use. Therefore, there would be no cumulative impacts on agriculture and forestry resources.

⁶ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed: April 2019.*

3. Air Quality

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

The following analysis is based on the findings of the *Thatcher Yard Residential Air Quality Impact Analysis* prepared by Urban Crossroads in March 2019 (the “Air Quality Report”). The Air Quality Report is available as Appendix A to this document.

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

Less Than Significant Impact. A significant air quality impact may occur if a project is not consistent with the applicable Air Quality Management Plan (AQMP), or would in some way represent a substantial hindrance to employing the policies, or obtaining the goals, of that plan.

The City, including the Project Site, is within the South Coast Air Basin (“Basin”), and the South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. The SCAQMD has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted on March 3, 2017 by the Governing Board of the SCAQMD. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in previous AQMPs have substantially decreased exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the National Ambient Air Quality Standards (NAAQS), as well as, explore new and innovative

methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels.⁷ The 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016 RTP/SCS and updated emission inventory methodologies for various source categories.⁸

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993). These indicators are discussed below:

Consistency Criterion No. 1: The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the California Ambient Air Quality Standards (CAAQS) and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) or regional significance thresholds were exceeded. The Project would not exceed the applicable LSTs or regional significance thresholds for construction activity (see discussion below under Questions 3(b), 3(c), and 3(d)). Therefore, the Project would not conflict with the AQMP according to this criterion.

Operational Impacts

The Project would not exceed the applicable LST or regional significance thresholds for operational activity (see discussion below under Questions 3(b), 3(c), and 3(d)). Therefore, the Project would not conflict with the AQMP according to this criterion.

On the basis of the preceding discussion, the Project is consistent with the first criterion.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Overview

The 2016 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop

⁷ South Coast Air Quality Management District. *Final 2016 Air Quality Management Plan (AQMP)*, March 2017, website: <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>, accessed: April 2019.

⁸ Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016, website: <http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS.pdf>, accessed April 2019.

future air quality forecasts for the AQMP. Development consistent with the growth projections in City General Plan is considered to be consistent with the AQMP.

Construction Impacts

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities.

Operational Impacts

The Project is located within the Venice Community Plan (Community Plan) under the jurisdiction of the City. As per the City's General Plan Land Use Map, the Project site is designated as Public Facilities (PF). As per Venice Community Plan, Public Facilities should be developed in accordance with user needs, site area, design and general location identified in the Service Systems Element and the Safety Element of the General Plan. The Project is a public/private partnership with the City and proposes to construct a total of 98 residential apartment units, 68 of which will be reserved for seniors and 30 dwelling units that will accommodate families. All of the units would be considered affordable and the rents will be prescribed by covenants and agreements in accordance with various local, state, and federal standards. A minimum of 20 percent of the family units will be set-aside as Low-Income units per a covenant for a period of 55 years, monitored and regulated by the Los Angeles Housing and Community Investment Department in accordance with LAMC Section 12.22.A.25. Similarly, the senior units will be age-restricted to qualifying residents who are disabled or age 62 years or older, pursuant to LAMC Section 12.21-A.4(u). Supportive services will also be provided for tenants who may necessitate additional assistance to transition into a long-term housing arrangement. These services will be accessible to residents on-site, within rooms provided in the central building along Thatcher Avenue.

Additionally, the Project would not exceed regional or local thresholds and would therefore be considered to have a less than significant impact. As such, the development proposed by the Project would be consistent with the growth projections in the General Plan and is therefore considered consistent with the AQMP.

On the basis of the preceding discussion, the Project is determined to be consistent with the second criterion.

AQMP Consistency Conclusion

The Project would not result in or cause NAAQS or CAAQS violations. The Project would not result in any construction-source or operational-source emissions exceedances. The Project is therefore considered to be consistent with the AQMP. Thus, the Project would not conflict with or obstruct implementation of the AQMP, and this impact would be less than significant.

- b) **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. A significant impact may occur if a project would add a cumulatively considerable contribution to federal or State non-attainment pollutants. The Basin, wherein the Project Site is located, is currently in nonattainment for ozone, lead, and particulate matter (PM).

The Project has been evaluated to determine if it will violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it will result in a cumulatively considerable net increase of a criteria pollutant for which the South Coast Air Basin (SCAB) is non-attainment under an applicable federal or state ambient air quality standard. The significance of these potential impacts is described below.

Standards of Significance

The SCAQMD has developed regional and localized significance thresholds for regulated pollutants, as summarized in Table V-1. The SCAQMD's CEQA Air Quality Significance Thresholds (March 2015) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. It should be noted that the SCAQMD provides a threshold for emissions of lead, however for purposes of this analysis no lead emissions are calculated as there are no substantive sources of lead emissions. Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

**Table V-1
Maximum Daily Emissions Thresholds**

Pollutant	Construction (lbs/day)	Operation (lbs/day)
Regional Thresholds		
NOx	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SOx	150	150
CO	550	550
Lead	3	3
Localized Thresholds		
NOx	103 lbs/day (Demolition)	147 lbs/day
	125 lbs/day (Site Preparation)	
	103 lbs/day (Grading)	

CO	562 lbs/day (Demolition)	827 lbs/day
	695 lbs/day (Site Preparation)	
	562 lbs/day (Grading)	
PM10	4 lbs/day (Demolition)	2 lbs/day
	5 lbs/day (Site Preparation)	
	4 lbs/day (Grading)	
PM2.5	3 lbs/day (Demolition)	1 lbs/day
	4 lbs/day (Site Preparation)	
	3 lbs/day (Grading)	
<i>Source: Regional Thresholds presented in this table are based on the SCAQMD Air Quality Significance Thresholds, March 2015. Localized Thresholds presented in this table are based on SCAQMD Final Localized Significance Threshold Methodology, July 2008.</i>		

Construction Emissions

Construction activities associated with the Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the following construction activities:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Construction is expected to commence in September 2020 and will last through June 2022. Construction duration by phase is shown in Table 3-2 of the Air Quality Report (see Appendix A to this document). The construction schedule utilized in the analysis represents a “worst-case” analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.⁹ A detailed summary of construction equipment is shown in Table 3-3 of the Air Quality Report (Appendix A). The site-specific construction fleet may vary due to specific project needs at the time of construction. The duration of construction activity and associated equipment both represent a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Detailed modeling inputs/outputs are available in the Air Quality Report (Appendix A).

The Project will require demolition/removal of up to 2,400 cubic yards/4,698 tons of existing pavement. Additionally, based on consultation with the Project applicant, the Project is expected

⁹ As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2, Section 4.3 “OFFROAD Equipment” as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

require 4,800 cubic yards of soil export for a total of 7,200 cubic yards of material exported from the site. Dust is typically a major concern during rough grading activities and removal of pavement. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions”. Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity.

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 have been taken.

The estimated maximum daily construction emissions without mitigation are summarized in Table V-2. Detailed construction model outputs are presented in Appendix 3.1 of the Air Quality Report (Appendix A to this document). As shown in Table V-2, Project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Therefore, a less than significant air quality impact would occur from construction of the Project.

**Table V-2
Maximum Daily Construction Emissions Summary**

Year	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
2020	3.18	59.35	19.61	0.12	6.31	3.05
2021	2.53	18.59	18.59	0.04	1.81	1.09
2022	25.62	16.98	18.14	0.04	1.68	0.97
Maximum Daily Emissions	25.62	59.35	19.61	0.12	6.31	3.05
SCAQMD Regional Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No
<i>Source: Urban Crossroads, Thatcher Yard Residential Air Quality Impact Analysis, March 2019.</i>						

Localized Significance – Construction

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as LSTs.

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO₂, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they

increase ambient concentrations by a measurable amount. This would apply to PM₁₀ and PM_{2.5}; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology).

Applicability of LSTs for the Project

For this Project, the appropriate Source Receptor Area (SRA) for the LST analysis is the SCAQMD Northwest Coastal LA County monitoring station (SRA 2)). LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter ≤ 10 microns (PM₁₀), and particulate matter ≤ 2.5 microns (PM_{2.5}). The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-related construction, the following process is undertaken:

- CalEEMod is utilized to determine the maximum daily on-site emissions that will occur during construction activity.
- The SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.
- If the total acreage disturbed is less than or equal to five acres per day, then the SCAQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact. The look-up tables establish a maximum daily emissions threshold in pounds per day that can be compared to CalEEMod outputs.
- If the total acreage disturbed is greater than five acres per day, then LST impacts are appropriately evaluated through dispersion modeling.
- The LST methodology presents mass emission rates for each SRA, project sizes of 1, 2, and 5 acres, and nearest receptor distances of 25, 50, 100, 200, and 500 meters. For project sizes between the values given, or with receptors at distances between the given receptors, the methodology uses linear interpolation to determine the thresholds.

Emissions Considered

SCAQMD's Methodology clearly states that "off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs."¹⁰ Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Sensitive Receptors

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours. The nearest sensitive receptor is a residential home, located approximately 10 feet from the Project Site, as described below and as shown on Exhibit 3-A of the Air Quality Report (see Appendix A).

R1: Located approximately 69 feet northwest of the Project site, R1 represents existing residential homes on the north side of Princeton Drive.

R2: Location R2 represents the existing residential apartment building located approximately 73 feet northeast of the Project site on the east side of Thatcher Avenue.

R3: Location R3 represents the existing residential apartment building located roughly 49 feet from the Project site boundary on the east side of Thatcher Avenue.

R4: Location R4 represents the existing residential apartment building located roughly 41 feet from the Project site boundary on the east side of Thatcher Avenue.

R5: Location R5 represents existing residential homes within a gated community located approximately 34 feet south of the Project site on Harbor Crossing Lane.

R6: Location R6 represents the residential home and outdoor living area (backyard) located roughly 10 feet from the Project site boundary on the cul-de-sac of Oxford Avenue.

R7: Location R7 represents the existing residential homes located west of the Project site, at roughly 65 feet, on the west side of Oxford Avenue.

The nearest sensitive receptor is a residential home located on the Oxford Avenue cul-de-sac immediately adjacent to Project Site to the southwest. Notwithstanding, the Methodology explicitly states that "It is possible that a project may have receptors closer than 25 meters. According to the methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." Therefore, LSTs for receptors located at 25 meters were utilized in the Air Quality Report.

¹⁰ *South Coast Air Quality Management District, Localized Significance Thresholds Methodology, 2003.*

Construction Source Emissions LST Analysis

The maximum number of acres disturbed in a day during Project construction would be 1.5 acres. Since the total acreage disturbed is less than five acres per day for demolition, site preparation, and grading activities, the SCAQMD's screening look-up tables are utilized in determining impacts. As previously noted, a 25-meter receptor distance is utilized to determine the LSTs for emissions of CO, NO₂, PM₁₀, and PM_{2.5}.

Table V-3 identifies the localized impacts at the nearest receptor location in the vicinity of the Project. As shown below, emissions during construction activity would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant and a less than significant impact would occur.

**Table V-3
Localized Significance Summary Construction**

	Pollutant Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Demolition Emissions				
Maximum Daily Emissions	20.95	14.66	2.93	1.35
SCAQMD Localized Threshold	103	562	4	3
Exceeds Thresholds?	No	No	No	No
On-Site Site Preparation Emissions				
Maximum Daily Emissions	20.18	11.55	1.41	0.80
SCAQMD Localized Threshold	125	695	5	4
Exceeds Thresholds?	No	No	No	No
On-Site Grading Emissions				
Maximum Daily Emissions	21.87	10.51	3.83	2.28
SCAQMD Localized Thresholds	103	562	4	3
Exceeds Thresholds?	No	No	No	No
<i>Source: Urban Crossroads, Thatcher Yard Residential Air Quality Impact Analysis, March 2019.</i>				

Operational Emissions

Operational activities associated with the proposed Project will result in emissions of VOCs, NO_x, SO_x, CO, PM₁₀, and PM_{2.5}. Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Fireplaces

The Project is not proposing to install any fireplaces and therefore would not result in any emissions associated with hearths/fireplaces.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered.

Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project-related operational air quality impacts are derived primarily from vehicle trips generated by the Project. Trip characteristics available from the *Technical Memorandum – Thatcher Yard Residential Project* prepared by Linscott, Law & Greenspan, Engineers in January 2019 (the “Traffic Memo”) were utilized in this analysis.

As estimated by the Traffic Memo, the Project is expected to generate a net total of approximately 212 trip-ends per day on a typical weekday with 21 AM peak hour trips and 19 PM peak hour trips.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

Table V-4 summarizes the Project's daily regional emissions from on-going operations. During operational activity, the Project will not exceed any of the thresholds of significance. Detailed operational model outputs are presented in Appendix 3.2 Air Quality Report (Appendix A to this document). As shown in Table V-4, Project operation would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Therefore, a less than significant air quality impact would occur from operation of the Project.

**Table V-4
Maximum Daily Operational Emissions Summary**

Operational Activities – Summer Scenario	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area Source	2.35	1.72	8.79	0.01	0.18	0.18
Energy Source	0.04	0.37	0.16	2.34E-03	0.03	0.03
Mobile Source	0.43	2.06	5.87	0.02	1.75	0.48
Subtotal Summer Emissions	2.82	4.15	14.82	0.03	1.96	0.69
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Operational Activities – Winter Scenario	VOC	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Area Source	2.35	1.72	8.79	0.01	0.18	0.18
Energy Source	0.04	0.37	0.16	2.34E-03	0.03	0.03
Mobile Source	0.42	2.11	5.56	0.02	1.75	0.48
Subtotal Winter Emissions	2.81	4.20	14.51	0.03	1.96	0.69
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Source: Urban Crossroads, Thatcher Yard Residential Air Quality Impact Analysis, March 2019.

Localized Significance – Operation

Table V-5 shows the calculated emissions for the Project's operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, the CalEEMod model outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table V-4 represent all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources. Considering that the trip length used in CalEEMod for the Project is approximately 14.7 miles for passenger cars, 5% of this total would represent an on-site travel distance of approximately 0.75 miles/3,960 feet for passenger cars. Thus the 5%

assumption is conservative and would tend to overstate the actual impact. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operational-source emissions would not exceed applicable LSTs.

As previously stated, a 25-meter receptor distance is utilized as a screening threshold to determine LSTs for emissions of NO₂, CO, PM₁₀, and PM_{2.5}.

As shown on Table V-5 operational emissions will not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project will have a less than significant localized impact during operational activity.

**Table V-5
Localized Significance Summary of Operations**

Operational Activity	Pollutant Emissions (pounds/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	2.26	9.24	0.29	0.23
SCAQMD Localized Threshold	147	821	2	1
Exceeds Thresholds?	No	No	No	No
<i>Source: Urban Crossroads, Thatcher Yard Residential Air Quality Impact Analysis, March 2019.</i>				

As discussed above, the mass daily construction and operational emissions generated by the Project would not exceed any of thresholds of significance recommended by the SCAQMD. Also, localized emissions generated by the Project would not exceed the SCAQMD's LSTs. Therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment. Thus, cumulative air quality impacts associated with the Project would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours. The nearest sensitive receptor is a residential home, located approximately 10 feet from the Project Site, as described above and as shown on Exhibit 3-A of the Air Quality Report (see Appendix A).

As discussed above, the nearest sensitive receptor is residential home located on the Oxford Avenue cul-de-sac immediately adjacent to Project Site to the southwest. Notwithstanding, the Methodology explicitly states that "It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should

use the LSTs for receptors located at 25 meters.” Therefore, LSTs for receptors located at 25 meters were utilized in the Air Quality Report.

As discussed above and shown in Tables V-3 and V-5, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less Than Significant Impact. A significant adverse effect could occur if construction or operation of a project would create emissions affecting a substantial number of people.

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. 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 involves the construction and operation of a residential use, which is not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and Volatile Organic Compounds (VOC) would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation is required.

Cumulative Impacts

Cumulative projects include local development as well as general growth within the Project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area.

The Project area is out of State attainment for both ozone and particulate matter (PM-10 and PM-2.5). Because the South Coast Air Basin is currently in nonattainment for PM-10 and PM-2.5, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, the SCAQMD considers any construction-related and/or operational emissions from individual projects that exceed the project-specific thresholds of significance

identified above to be considered cumulatively considerable. As discussed above, the maximum mass daily regional and localized construction-related and operational emissions associated with the Project would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and would not be cumulatively considerable. With respect to long-term emissions, this Project would create a less than significant cumulative impact and no mitigation measures are required.

As with the Project, construction of the related projects are expected to involve standard construction activities and potential construction odors would include diesel exhaust emissions, roofing, painting, and paving operations. There would be situations where construction activity odors would be noticeable by residents nearby each of the related construction sites. However, these temporary odors are typical of construction activities and are generally not considered to be objectionable. Additionally, these odors would dissipate rapidly from the source with an increase in distance and construction activities would be subject to applicable construction and air quality regulations (including proper maintenance of machinery) in order to minimize engine emissions. Construction of the Project is not expected to contribute to substantial odors at sensitive uses near any of the other related construction sites in the local vicinity. Therefore, cumulative odor impacts resulting from construction activities would not be considerable or significant.

4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited.

The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The central and valley portions of the City contain fewer natural areas.¹¹ The Project Site and surrounding area are not identified as a biological resource area.¹² Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.¹³

The Project Site is currently a vacant paved lot. As the Project Site is nearly completely developed with hardscaping within a heavily urbanized area of the City, the Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. No such species or habitats are known to occur at the site per local or regional plans by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity. The Project Site is not located near undeveloped natural/undisturbed open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Furthermore, the Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.¹⁴

The landscape architect reviewed the existing trees on site and determined that there are no trees of "Protected" status as defined under City Ordinance 177,404 (i.e., Oaks (*Quercus* sp.) indigenous to California but excluding the Scrub Oak (*Quercus dumosa*), Southern California Black Walnut (*Juglans californica* var. *californica*), Western Sycamore (*Platanus racemosa*) and California Bay (*Umbellularia californica*)). The trees on the Project Site are ornamental/exotic species that were planted on the southwesterly perimeter to screen the City's former maintenance yard activities on the site from the residential properties located across Oxford Street. No protected species trees as defined under City Ordinance 177,404 are present on the Project Site. Therefore, the Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. In addition, there are no known locally designated natural communities at the Project Site or in

¹¹ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-1 – C-2.

¹² City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area).

¹³ Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website:
http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public,
accessed: April 2019.

¹⁴ California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: April 2019.

the Project vicinity. Therefore, the Project would have less than significant impacts on sensitive biological species or habitat and no mitigation measures are required.

- 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. A significant impact would occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation.

The Project Site is within an urban, developed area. No riparian or other sensitive habitats are located on the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area.¹⁵ Therefore, implementation of the Project would not result in adverse impacts to riparian habitat or other sensitive natural communities. No impacts would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if state federally protected wetlands are modified or removed without adequate mitigation.

The Project Site is currently a vacant paved lot in an urbanized area of the City. Review of the National Wetlands Inventory identified the nearest mapped estuarine area is the marina of Marina del Rey, approximately 500 feet southwest of the Project Site. The Project would not directly or indirectly affect the marina. The Project does not include removal, filling, hydrological interruption, or any other affects of this nearby waterbody. Furthermore, the Project Site itself does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Therefore, no impacts to riparian or wetland habitats would occur with implementation of the Project and no mitigation measures are required.

- 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. A significant impact would occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

Due to the condition and location of the Project Site, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Although none of the on-site tree species are protected by

¹⁵ Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed: April 2019.

the City's tree protection ordinance, the existing trees may provide temporary suitable habitat for nesting migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). The MBTA, an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Section 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). Tree removals would be undertaken pursuant to applicable City permits and requirements. The Project would be required to comply with these existing federal and State laws (MBTA and California Fish and Game Code, respectively). Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance No. 177,404. As set forth in Ordinance No. 177,404, any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, is a protected tree:

- Oak tree including Valley Oak (*Quercus lobata*), 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 racemose*); and
- California Bay (*Umbellularia californica*).

Additionally, on April 12, 2018, the Los Angeles City Planning Commission approved and recommended that the City Council adopt an amendment to the Protected Tree Ordinance that would add the Mexican Elderberry (*Sambucus Mexicana*) and Toyon (*Heteromeles arbutifolia*) to the list of protected trees.

The landscape architect for the Project, Segal Shuart, reviewed the existing trees on site and determined that there are no trees of "protected" status as defined under City Ordinance 177,404.¹⁶ Removal of all street trees in the public right-of-way would occur in accordance with the policies of the Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Types of trees and planting locations would be reviewed and approved by the Bureau of Street Services' Urban Forestry Division. Therefore, impacts would be less than significant, and no mitigation measures are required.

¹⁶ Segal Shuart, *Landscape Site Plan, Thatcher Yard, Entitlement Set, December 6, 2018.*

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

No Impact. A significant impact would occur if a project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.¹⁷ Therefore, no impacts would occur and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the biological resources analysis above, including special status species and habitat, riparian habitat and sensitive natural communities, wetlands, wildlife movement, protected trees, etc. The cumulative impacts biological resources study area is the extent of the related projects.

As discussed above, the Project would not result in a potentially significant impact to biological resources. The Project Site and the related projects are located in a highly developed area in the City, and no wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service have been identified in the vicinity of the Project Site. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance, Federal Migratory Bird Treaty Act, and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and any other mitigation measures or regulatory compliance measures applicable to each project. Thus, cumulative impacts to biological resources would be considered less than significant.

¹⁷ *California Department of Fish and Wildlife, California Regional Conservation Plans, August 2015, website: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: April 2019.*

5. Cultural Resources

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

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

No Impact. A significant impact may occur if a project would result in a substantial adverse change in the significance of an historic resource. Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as:

- 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;
- 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or
- 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology.

The Project Site is currently vacant and was previously used as a Bureau of Sanitation maintenance yard. There are no structures or other resources on the site. According to the City Zoning Information and Map Access System (ZIMAS) and the Los Angeles Historic Resources

Inventory, the Project Site is not identified on any historic resource lists or databases.^{18,19} Therefore, the Project would have no impact on historical resources, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with a project would damage, or degrade an archaeological resource or its setting that is found to be important under the criteria of CEQA. Based on a review of City Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site is within proximity of an area of known archaeological sites or archaeological survey areas.²⁰ However, the Project Site is located in a highly urbanized area of the City and has been subject to past disturbance, including the construction of various types of land uses. Any archaeological resources that may have existed near the Project Site surface are likely to have been disturbed or previously removed. However, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during Project excavation and grading activities. If previously unknown archaeological resources are found during excavation and grading, the Project would be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. A significant adverse impact could occur if grading or excavation activities associated with a project were to disturb previously interred human remains. It is unknown whether human remains are located at the Project Site. Any human remains that may have existed near the site surface are likely to have been disturbed or previously removed. Even so, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC Section 5097), relating to the disposition of Native American burials would be required. Considering the low potential for any human remains to be located on the Project Site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities,

¹⁸ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

¹⁹ City of Los Angeles, Office of Historic Resources, *Los Angeles Historic Resources Inventory*, website: <http://www.historicplacesla.org/map>, accessed: April 2019.

²⁰ City of Los Angeles, *Citywide General Plan Framework Final Environmental Impact Report*, certified August 2001, Figure CR-1, *Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles*.

the Project's impact on human remains would be less than significant and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the cultural resources analysis above, including historic and archaeological resources and human remains. The cumulative impacts study area for cultural resources is the extent of the related projects.

The Project would result in less than significant impacts to historical or archaeological resources. It is unknown whether or not any of the properties on which the related projects are located contain cultural resources. Any related project sites that contain historical or archaeological resources or human remains would be required to comply with regulations similar to those that are required for the Project. Since the Project would not cause a significant impact with respect to cultural resources, there is no potential for the Project to contribute to a cumulative impact and no mitigation measures are required.

6. Energy

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

- a) **Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less Than Significant Impact. A significant impact may occur if the Project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation.

Methodology

Construction

Electricity usage associated with the supply and conveyance of water used for dust control during construction was calculated using data from the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 outputs prepared for the greenhouse gas emissions analysis (GHG Report) for the Project.²¹ Electricity used to power lighting, electronic equipment, and other construction activities necessitating electrical power is not easily quantifiable. However, such electricity demand would be temporary, limited, and would cease upon the completion of construction. Accordingly, electricity usage associated with such miscellaneous uses was assumed to be negligible. In terms of natural gas, construction activities typically do not involve the consumption of natural gas. Fuel consumption from on-site heavy-duty construction equipment was calculated based on the equipment mix and usage factors provided in the CalEEMod construction output files included in Appendix D of this checklist. The total horsepower was then multiplied by fuel usage estimates per horsepower-hour included in Table A9-3-E of the South Coast Air Quality Management District's (SCAQMD) *CEQA Air Quality Handbook*. Fuel consumption from construction worker, vendor, and delivery/haul trucks was calculated using the trip rates and distances provided in the CalEEMod construction output files. Total VMT was then calculated for each type of construction-related trip and divided by the corresponding county-specific miles per gallon factor using CARB's EMFAC 2016 model, which provides the total annual VMT and fuel consumed for each vehicle type. Consistent with CalEEMod, construction worker

²¹ See the CalEEMod output files in Appendix D and the Energy Calculations in Appendix B of this document.

trips were assumed to include 50 percent light duty gasoline automobiles and 50 percent light duty gasoline trucks. Construction vendor and delivery/haul trucks were assumed to be heavy-duty diesel trucks. Refer to Appendix D of this checklist for detailed calculations.

Operation

Annual consumption of electricity (including electricity usage associated with the supply and conveyance of water) and natural gas was calculated using demand factors provided in CalEEMod as part of the GHG analysis included in Section 8 (Greenhouse Gas Emissions) of this checklist. CalEEMod provides default factors based on the 2016 Title 24 standards, which went into effect on January 1, 2017.

Energy impacts associated with transportation during operation were also assessed. Daily trip generation used in this analysis was based on the *Technical Memorandum – Thatcher Yard Residential Project* prepared by Linscott, Law & Greenspan, Engineers in January 2019 (“Traffic Memo”), which is included as Appendix H to this checklist. As discussed therein, the trip generation for the Project was determined based on the Institute of Transportation Engineers’ trip generation factors for the applicable land uses. The daily Project-related trips were then input into CalEEMod, which calculated the annual VMT. The resulting annual VMT was used as part of the GHG analysis included in Section 8 (Greenhouse Gas Emissions) of this checklist. Based on this annual VMT, gasoline and diesel consumption rates were calculated using the county-specific miles per gallon based on EMFAC 2016. The vehicle fleet mix for vehicles anticipated to visit the Project Site was calculated consistent with the CalEEMod default for Los Angeles County. Supporting calculations are provided in Appendix D of this checklist (GHG Report).

The Project’s estimated energy demands were also analyzed relative to LADWP’s and SoCalGas’ existing and planned energy supplies in 2022 (i.e., the Project occupancy year) and in applicable horizon years for their respective supply planning documents (2039 for LADWP’s 2017 Power Strategic Long-Term Resource Plan and 2035 for the California Energy and Electric Utilities’ 2018 Gas Report) to determine if these two energy utility companies would be able to meet the Project’s energy demands.

Electricity

The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City, serving approximately 4 million people within a service area of approximately 465 square miles. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes the LADWP service area north of Mulholland Drive, and the Metropolitan Planning District includes the LADWP service area south of Mulholland Drive. The Project Site is 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. Approximately 29 percent of LADWP’s 2017 electricity purchases were from renewable sources, which is similar to the 25 percent statewide percentage of electricity purchases from renewable

sources.²² Furthermore, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020 and is committed to meeting the requirement of the Renewables Portfolio Standard (RPS) Enforcement Program to use at least 50 percent of the State's energy from renewables by 2030.²³ The current sources procured by LADWP include biomass and waste, wind, solar, hydroelectric, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2017, the most recent year for which data are available.²⁴ This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Additionally, LADWP is on track to meet 65 percent or more energy from renewable sources by 2036 through the commission of large-scale solar projects (Moapa Southern Paiute Solar, Copper Mountain 3 Solar), expansion of customer-owned rooftop and ground-mounted solar projects, and construction of a new geothermal project in Imperial County.²⁵

Natural Gas

Natural gas is provided to the Project Site by the Southern California Gas Company (SoCalGas). SoCalGas is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SoCalGas serves approximately 21.8 million customers in more than 500 communities encompassing approximately 24,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.²⁶

SoCalGas 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.²⁷ The traditional, southwestern United States sources of natural gas will continue to supply most of SoCalGas' natural gas demand. The Rocky Mountain supply is available but is used as a supplementary supply source, and the use of Canadian sources provide only a small share of SoCalGas supplies due to the high cost of transport.²⁸

Petroleum-Based Fuels

According to the California Energy Commission (CEC), transportation accounted for nearly 37 percent of California's total energy consumption in 2016.²⁹ Petroleum-based fuels currently

²² California Energy Commission, *Utility Annual Power Content Labels for 2017*, www.energy.ca.gov/pcl/labels/ accessed: April 2019.

²³ City of Los Angeles, Department of Water and Power, *Renewables Portfolio Standard*, website; <https://www.arb.ca.gov/energy/rps/rps.htm> accessed: April 2019.

²⁴ California Energy Commission, *Utility Annual Power Content Labels for 2017*, www.energy.ca.gov/pcl/labels/ accessed: April 2019.

²⁵ City of Los Angeles, Department of Water and Power, News Releases, *LADWP Achieves 25 Percent Renewable Energy Milestone*, available at: <http://www.ladwpnews.com/ladwp-achieves-25-percent-renewable-energy-milestone-2/> accessed: April 2019.

²⁶ SoCalGas, *Company Profile*, www.socalgas.com/about-us/company-info.shtml accessed: April 2019.

²⁷ California Gas and Electric Utilities, *2018 California Gas Report*, page 80.

²⁸ California Gas and Electric Utilities, *2018 California Gas Report*, page 80.

²⁹ California Energy Commission, *2016 Integrated Energy Policy Report*, page 8, docketed January 18, 2017.

account for 90 percent of California’s transportation energy sources.³⁰ However, the state is now working on developing flexible strategies to 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 GHGs from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined.³¹ The CEC predicts that the demand for gasoline will continue to decline over the next ten years, and there will be an increase in the use of alternative fuels.³² Revisions to EPA fuel economy testing methods in 2006 as well as to manufacturing calculations in 2017 have also resulted in improved fuel efficiency of gasoline- and diesel-powered vehicles, resulting in a reduction of fuel consumption.

Construction Impacts

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 Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Construction would occur over approximately 20 months and is expected to be completed in 2022. Table V-6 presents the estimated energy consumption during construction. As shown, construction of the Project would require a total of 347 kWh of electricity, 19,730 gallons of gasoline, and 58,280 gallons of diesel.

Table V-6
Summary of Annual Energy Use During Project Construction^a

Fuel Type	Quantity^b
Electricity	
Water Consumption	347 kWh
Lighting, Equipment, Other Electrical Power	-- ^c
Total Electricity	347 kWh
Gasoline	
On-Road Construction Equipment	19,730 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	19,730 gallons
Diesel	
On-Road Construction Equipment	11,429 gallons
Off-Road Construction Equipment	46,851 gallons

³⁰ California Energy Commission, 2016-2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, page 7, March 2016.

³¹ State Board of Equalization, Economic Perspective, Discussion of Recent Economic Developments, Publication 329, Volume XIX, Number 1, February 2013.

³² California Energy Commission, 2015 Integrated Energy Policy Report.

Table V-6
Summary of Annual Energy Use During Project Construction^a

Fuel Type	Quantity ^b
Total Diesel	58,280 gallons
<p><i>kWh = kilowatt hours</i></p> <p><i>a Detailed calculations are provided in Appendix B to this document.</i></p> <p><i>b Calculated energy consumption rounded to the nearest hundred.</i></p> <p><i>c Electricity usage associated with this line item is not easily quantifiable. Such electricity demand would be temporary, limited, and would cease upon the completion of construction.</i></p> <p><i>Source: EcoTierra Consulting, Inc., 2019.</i></p>	

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 Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. This would be consistent with suggested measures in the *2006 L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline- or diesel-powered generators.

As shown in Table V-6, a total of approximately 347 kWh of electricity would be consumed during Project construction. This 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. Based on LADWP's 2017 Power Strategic Long-Term Resource Plan (Resource Plan), the LADWP forecasts that its total electricity sales in the 2022–2023 fiscal year (the Project's buildout year) will be 22,802 GWh of electricity.^{33,34} As such, the construction-related electricity requirement would be negligible compared to the forecasted sales for the Project's buildout year.

Furthermore, when not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable.

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.

³³ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

³⁴ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A.

Transportation Energy

During construction, gasoline and diesel fuel would be required to power on- and off-road vehicles associated with worker transportation, equipment (dozers, loaders, excavators, forklifts, etc.), delivery vehicles, and hauling trucks. The petroleum-based fuel use summary provided above in Table V-6 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions, provided in Appendix D of this checklist. As shown, on- and off-road vehicles would consume an estimated 19,730 gallons of gasoline and approximately 58,631 gallons of diesel fuel, for a total of 58,281 gallons of transportation-related fuel usage throughout the Project's construction. According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 3.99 billion gallons of gasoline and 0.68 billion gallons of diesel fuel in 2016.³⁵ As such, the construction-related transportation-related fuel usage would represent a very small fraction of the County's total fuel consumption.

Furthermore, with regard to transportation fuels and 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.

Operational Impacts

During operation of the project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (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. Table V-7 presents the estimated annual energy consumption during operation.

Table V-7
Summary of Annual Energy Use During Project Operation^a

Fuel Type	Quantity ^b
Electricity	
Structures	700,764 kWh
Water	110,029 kWh
Total Electricity	810,793 kWh
Natural Gas	
Structures	1,489,383 cf
Total Natural Gas	1,489,383 cf
Transportation	
Gasoline	41,065 gallons
Diesel	7,176 gallons
Total Transportation	48,241 gallons
<i>kWh = kilowatt hours; cf = cubic feet</i>	
<i>a Detailed calculations are provided in Appendix B to this document.</i>	

³⁵ California Air Resources Board, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/.

Table V-7
Summary of Annual Energy Use During Project Operation^a

Fuel Type	Quantity ^b
<i>b</i> Calculated energy consumption rounded to the nearest hundred. Source: EcoTierra Consulting, Inc., 2019.	

Electricity

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (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 in Table V-7, operation of the Project would require approximately 810,793 kWh of electricity annually. Based on LADWP's 2017 Power Strategic Long-Term Resource Plan (Resource Plan), the LADWP forecasts that its total electricity sales in the 2022–2023 fiscal year (the Project's buildout year) will be 22,802 GWh of electricity and 27,668 GWh during 2039-2040 (the Resource Plan's horizon year).^{36,37} As such, the Project's annual operational electricity demand would represent approximately 0.004 percent of LADWP's forecasted sales for the Project's buildout year (2022) and 0.003 percent for the Resource Plan's horizon year (2039).

In addition, the Project would be required to comply with 2016 Title 24 standards and applicable 2016 CALGreen requirements. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. Specifically, as required by current Title 24 and CALGreen standards, the Project would include installation of energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems, low-flow water-use fixtures, and energy-efficient pumps and motors for waste and stormwater conveyance, fire water, and domestic water. These measures would further reduce the estimated electricity consumption calculated above.

Natural Gas

Consumption of natural gas during operation of residential land uses such as those proposed under the Project include water heaters, stoves, gas-powered fireplaces, furnaces, etc. As shown in Table V-7, operation of the Project would require approximately 1,489,383 cubic feet (cf) of natural gas annually, or 4,081 cf per day. Based on the 2018 California Gas Report (Gas Report), the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022 (the Project's buildout year) and 2,313 million cf per day in 2035 (the Gas Report's horizon year).³⁸ As such, the Project would account for approximately 0.0002 percent of the forecasted consumption of natural gas in

³⁶ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

³⁷ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A.

³⁸ California Gas and Electric Utilities, 2018 California Gas Report, p. 102-103.

SoCalGas' planning area for the Project's buildout year and 0.0002 percent for the Gas Report's horizon year.

In addition, the Project would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR, which is a set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. The Project would comply with 2016 Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Specifically, the Project would install energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems, and low-flow water-use fixtures, reducing water consumption and water heating fuel (natural gas). These measures would further reduce the estimated natural gas consumption calculated above.

Petroleum-Based Fuels

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site by residents and visitors. During Project operations, vehicles travelling to and from the Project Site are assumed to comply with Corporate Average Fuel Economy (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. As shown in Table V-7, operation of the Project would consume approximately 41,065 gallons of gasoline and 7,176 gallons of diesel annually. As previously discussed, Los Angeles County on-road transportation sources consumed 3.99 billion gallons of gasoline and 0.68 billion gallons of diesel fuel in 2016.³⁹ As such, the operational transportation-related fuel usage would represent a very small fraction of the County's total fuel consumption.

In addition, the Santa Monica Big Blue Bus (Lines 3, R3, and 18) Culver City Bus (Lines 1, 2, 5, and 7), and Metro (Line 108) provide local bus service in the Project Site area. These bus lines would provide residents and guests with various public transportation opportunities to further reduce VMT, resulting in a reduction in the consumption of petroleum-based fuels. Bicycle storage areas would also be provided for residents and guests. Furthermore, five of the 82 parking spaces would include electric vehicle (EV) chargers within the parking garage, further reducing consumption of petroleum-based fuels. Therefore, operation of the Project would not result in the wasteful, inefficient, or unnecessary consumption of petroleum-based fuels.

Summary

LADWP and SoCalGas currently have enough capacity to satisfy the existing electricity and natural gas demands of the City. As discussed above, LADWP's electricity generation is derived from a mix of non-renewable sources such as hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. Additionally, LADWP annually prepares 20-year load forecasts to ensure the reliability of its electricity supply and conveyance system. Accordingly, the projected electrical demand under the Project would be factored into LADWP's 20-year load forecasts and associated supply planning. Similarly,

³⁹ *California Air Resources Board, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/.*

SoCalGas installs new distribution facilities as needed to serve new land uses, according to California Public Utilities Commission (CPUC) rules. Natural gas supplied to 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.⁴⁰ 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.⁴¹ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Electric and natural gas services are provided upon demand from consumers and expanded as needed to meet demand, consistent with applicable local, State, and Federal regulations. 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.⁴²

Accordingly, the energy requirements during both construction and operation of the Project would be within the supply capabilities of LADWP and would have a negligible effect on natural gas and transportation-related fuel supplies. Further, as detailed above, the Project would implement energy efficiency features that would reduce consumption of electricity, natural gas, and transportation-related fuel consistent with applicable federal, state, and local regulations and policies. Accordingly, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Therefore, project impacts related to energy use would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency.

Electricity

As previously discussed, LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the State's energy from renewables by 2030.⁴³ 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 of Los Angeles Green Building Code. Specifically, the Project would include installation of energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control

⁴⁰ *California Gas and Electric Utilities, 2018 California Gas Report, 2018.*

⁴¹ *U.S. Energy Information Administration, Frequently Asked Questions, <https://www.eia.gov/tools/faqs/faq.php?id=58&t=8>.*

⁴² *BP Global, Oil Reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html.*

⁴³ *City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard, website; <https://www.arb.ca.gov/energy/rps/rps.htm>, accessed: April 2019.*

systems, low-flow water-use fixtures, and energy-efficient pumps and motors for waste and storm water conveyance, fire water, and domestic water.

In December 2017, LADWP adopted the 2017 Power Strategic Long-Term Resource Plan (SLTRP), which serves as a 20-year plan for LADWP to supply reliable electricity “in an environmentally responsible and cost effective manner”.⁴⁴ The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the city’s future energy needs at the lowest cost and risk consistent with LADWP’s environmental priorities and reliability standards. The SLTRP examines a total of eleven different case scenarios with a combination of strategies, including early coal replacement, accelerated renewable portfolio standard (RPS), energy efficiency, local solar, energy storage, and transportation electrification. The recommended SLTRP case scenario balances LADWP’s objectives and identifies four key initiatives – greenhouse gas reduction, transportation electrification, dispatchable resources, and Power System reliability.

One of the main focus of this SLTRP is on reducing GHG emissions while ensuring reliable electric service and maintaining cost competitive rates by examining multiple strategies to reduce GHG emissions including, early coal replacement, accelerated renewable portfolio standard (RPS), energy efficiency, local solar, energy storage, and transportation electrification. The combination of these greenhouse gas strategies will reduce LADWP’s GHG emissions to nearly 78 percent below 1990 levels over the next 20 years and over 82 percent below 1990 levels overall when considering GHG emissions absorbed from the transportation sector. The strategies of the SLTRP focus on sources of energy rather than efficiencies of each individual development or Project. As such, the Project would not conflict with the SLTRP.

Therefore, the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency with regard to electricity. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Natural Gas

As previously discussed, the *2018 California Gas Report* projects that California natural gas demand is expected to decline at an annual rate of 0.5 percent per year from 2018 to 2035 in the SCG service area, and that natural gas supplies are expected to meet Southern California’s gas demand.⁴⁵ The Project would be subject to the State Energy Conservation Standards contained in Title 24 of the CCR, which is a set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. The Project would comply with 2016 Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Specifically, the Project would install energy efficient heating and cooling systems, appliances (e.g., Energy Star®), equipment, and control systems, and low-flow water-use fixtures, reducing water consumption and water heating fuel (natural gas). Therefore, the Project would not conflict with or obstruct state or local plans for renewable energy

⁴⁴ *City of Los Angeles, Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017.*

⁴⁵ *The California Gas and Electric Utilities, 2018 California Gas Report, page 4.*

or energy efficiency with regard to natural gas. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Petroleum-Based Fuels

California is currently working on developing flexible strategies to 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 GHGs from the transportation sector, and reduce VMT. Overall, gasoline consumption in California has declined and the CEC predicts that the demand for gasoline will continue to decline over the next ten years. Eventually, there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. The Project would be consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, *Quantifying Greenhouse Gas Mitigation Measures*. Specifically, the Project characteristics listed below are consistent with the following measures applicable to the Project:

- CAPCOA Measure LUT-1—Increase Density: 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. The Project would increase the Project Site density from zero (0) dwelling units per acre to approximately 45.7 dwelling units per acre (98 proposed dwelling units on the 2.14-acre Project Site).
- CAPCOA Measure LUT-3—Increase Diversity of Urban and Suburban Developments (Mixed-Uses): The Project would increase on-site residential uses in proximity to existing off-site residential, office, retail and restaurant uses.
- CAPCOA Measure LUT-5—Increase Transit Accessibility: The Santa Monica Big Blue Bus (Lines 3, R3, and 18) Culver City Bus (Lines 1, 2, 5, and 7), and Metro (Line 108) provide local bus service in the Project Site area. The Project would also provide bicycle parking spaces to encourage utilization of alternative modes of transportation.
- CAPCOA Measure SDT-1—Provide Pedestrian Network Improvements: Project design would provide pedestrian access that minimizes barriers and links the Project Site with existing external streets to encourage people to walk instead of drive. The Project would provide several improvements including providing direct access to the existing off-site pedestrian network including existing sidewalks, to encourage and increase pedestrian activities in the area, which would further reduce VMT and associated transportation-related emissions.

SCAG's 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. In the RTP/SCS, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban; compact; or standard. SCAG used each

of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.⁴⁶ The RTP/SCS, Sustainable Communities Strategy Background Documentation, Appendix (April 2016), forecasted LDCs by county and subregion for 2012 and 2040. The Project Site is designated as “Urban”, the highest density and most intense land development category assessed in the RTP/SCS.⁴⁷ The Urban Land Development Category is described as follows:

These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle. (page 20)

The Project would comply with goals of the SCAG’s 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project’s location on an infill site within a HQTAs in proximity to major job centers would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Therefore, the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency with regard to petroleum-based fuel. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Cumulative Impacts

Electricity

Implementation of the Project, in conjunction with other projects in the vicinity, would cumulatively increase demands for electricity supplies and infrastructure capacity. As discussed above, LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 65 percent of the State’s energy from renewables by 2036. Although future development would result in the irreversible use of renewable and non-renewable electricity resources during Project construction and operation which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP’s service area. Furthermore, all new development in

⁴⁶ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, page 20.

⁴⁷ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, adopted April 2016, Sustainable Communities Strategy (SCS) Background Documentation Appendix, Exhibit 13 Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion and Exhibit 14 Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion.

California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of other development in the LADWP service area could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with further development in the LADWP service area, the resulting demand for electricity supply could be the same or less than the existing condition. Nonetheless, the 2017 Strategic Long Term Resource Plan (SLTRP) considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Through the SLTRP, LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. As such, the Project's incremental increase in electricity consumption was determined to be less than significant; thus Project impacts would not cumulatively be considerable. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

Natural Gas

Implementation of the Project, in conjunction with other projects in the vicinity, would increase demands for natural gas supplies and infrastructure capacity. SoCalGas forecasts take into account projected population growth and development based on local and regional plans. Although future 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 SoCalGas' service area. Furthermore, energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the LA Green Building Code. Similar to the Project, related projects and future development must also abide by the same statutes, regulations, and programs that mandate or encourage energy conservation. SoCalGas is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SoCalGas regularly updates its infrastructure reports as required by law. In addition, there is no evidence to suggest that SoCalGas will not be able to serve its service areas in the coming years as SoCalGas has determined it can meet projected demand. The Project's incremental increase in natural gas consumption would be less than significant, and thus, would not contribute to a cumulatively considerable impact. Therefore, cumulative impacts would be less than significant.

Transportation Energy

Implementation of the Project, in conjunction with other projects in the vicinity, would increase the demand for transportation-related fuel in the state and region. 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 GHGs from the transportation sector, and reduce vehicle miles traveled which would reduce reliance on petroleum fuels. 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, the Project would be consistent with the energy efficiency policies emphasized by the 2016 RTP/SCS. Specifically, the Project would be an infill development consisting of residential uses located within walking distance of a commercial corridor with transit service. The Project would provide greater proximity to neighborhood services, and jobs and would be well-served by existing public transportation, including Santa Monica, Culver City, and Metro bus lines. The Project would introduce new housing opportunities within a HQTAs, which is consistent with numerous policies in the 2016 RTP/SCS related to locating new jobs near transit.⁴⁸ By its very nature, the 2016 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Since the Project is consistent with the 2016 RTP/SCS, its contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel would be less than significant and thus, would not be cumulatively considerable. Therefore, cumulative impacts would be less than significant.

⁴⁸ *The Project Site is considered within a High Quality Transit Area (HQTAs) which are areas primarily around existing and planned transportation nodes designated in the 2016 RTP/SCS as defined by SCAG. SCAG defines an HQTAs as "areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. While HQTAs account for only three percent of total land area in SCAG region, they are planned and projected to accommodate 46 percent of the region's future household growth and 55 percent of the future employment growth."*

7. Geology and Soils

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

The following analysis is based on the findings of the *Geotechnical Investigation* prepared by Feffer Geological Consulting, Inc. dated May 18, 2017 ("Geotechnical Investigation") (the report is available as Appendix C to this document). The Geotechnical Investigation was approved by Los Angeles Department of Building and Safety (LADBS) in a letter dated May 29, 2018, which is also included in Appendix C.

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

Less Than Significant Impact. A significant impact may occur if a project is located within a State-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed.

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. Surface rupture of a fault generally occurs within 50 feet of an active fault line.

The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.⁴⁹ The nearest active fault is the Santa Monica Fault, approximately 6.2 miles north of the Project Site⁵⁰ and, thus, well over 50 feet away, which is the range within fault rupture generally occurs. Moreover, the Project Site is not within a Preliminary Fault Rupture Study Area.⁵¹ Thus, the potential for fault rupture at the Project Site would be low. Further, the Project would be required to comply with applicable state and local building and seismic codes and implement all site- and Project-specific design recommendations contained in the Geotechnical Investigation that was prepared for the Project and approved by the Los Angeles Department of Building and Safety. Conformance with current Building Code requirements and site-specific design recommendations in the Geotechnical Investigation would minimize the potential for people on the Project Site to sustain loss, injury, or death as a result of fault rupture. The Project would involve the construction of residential buildings in accordance with allowed uses under existing zoning and no proposed uses would have the potential to directly or indirectly expose people or structures to risk related to fault rupture. Accordingly, impacts would be less than significant and no mitigation is required.

- (ii) **Strong seismic ground shaking?**

Less Than Significant Impact. A significant impact would occur if a project represents an increased risk to public safety or destruction of property by exposing people, property or

⁴⁹ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

⁵⁰ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

⁵¹ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region.

The Project Site is located in the seismically active region of Southern California, and therefore, is susceptible to ground shaking during a seismic event. According to ZIMAS, the closest surface trace of an active fault to the Project Site is the Santa Monica Fault located approximately 6.2 miles to the north.⁵² The Santa Monica Fault is capable of producing a maximum magnitude of 6.6.⁵³ In addition to the Santa Monica Fault, other known active faults that could produce significant ground shaking at the Project Site include the Hollywood and Newport-Inglewood faults. Although the Project Site is located within proximity of several faults, it does not propose activities either during construction or operation that could cause in whole or in part strong seismic ground shaking, i.e., the Project does not include deep mining operations, fracking, or boring into the direct location of a fault line. Therefore, the Project does not have the likelihood of exacerbating existing environmental conditions that could cause strong seismic ground shaking.

Based on the Geotechnical Investigation, the Project Site is suitable for development and the Project is feasible from a geotechnical engineering standpoint, provided the advice and recommendations contained in the Geotechnical Investigation are included in the Project plans and are implemented during construction.⁵⁴ The Project would comply with the City Building Code, which incorporates, with local amendments, the latest editions of the International Building Code and California Building Code. Compliance with the City Building Code includes incorporation of seismic standards appropriate to the Project Site and its Seismic Design Category. Modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement in compliance with the Building Code. Additionally, LADBS would review the Project plans for consistency with the findings and recommendations of Geotechnical Investigation and the Building Code. LADBS would require that a Final Geotechnical Engineering Investigation, incorporating all findings and recommendations, be prepared and approved prior to the issuance of any grading or building permits. Conformance with the Geotechnical Investigation findings and all current Building Code requirements would minimize the potential for structures on the Project Site to sustain damage during an earthquake. Therefore, impacts would be less than significant and no mitigation measures are required.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project is located in an area identified as having a high risk of liquefaction and mitigation measures required within such designated areas are not incorporated into the project.

Liquefaction is a process that occurs when saturated sediments are subjected to repeated strain reversals during an earthquake. The strain reversals cause increased pore water pressure such that the internal pore pressure approaches the overburden pressure and the shear strength

⁵² City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

⁵³ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

⁵⁴ Feffer Geological Consulting, Inc., *Geotechnical Investigation*, May 18, 2017.

approaches zero. Liquefied soils may be subject to flow or excessive strain, which can cause settlement. Liquefaction occurs in soils below the groundwater table. Soils commonly subject to liquefaction include loose to medium dense sand and silty sand. Predominantly fine-grained soils, such as silts and clay, are less susceptible to liquefaction. Generally, plastic soils with a plasticity index of 18 or more and a moisture content not greater than 80% of the liquid limit, are not considered subject to liquefaction.

Soils and data collected in borings taken at the Project Site were utilized to quantify the liquefaction potential of the site. Parameters consisting of latitude and longitude were used to obtain the predominant earthquake magnitude from the United States Geological Survey (USGS) Interactive Deaggregation web site corresponding to a 10 percent probability in 50 years (475-year return period) and a 2 percent probability of exceedance in 50 years (2475-year return period). A ground acceleration of 0.45g (2/3rd of peak ground acceleration [PGA] for 10 percent exceedance) and 0.677 (PGA 2 percent exceedance) and a design magnitude earthquake of 6.6 (475-year) and 6.77 (2475-yr) were used for the analyses.⁵⁵ For conservatism two analyses were performed; one assumed that groundwater was at the historical high of 5 feet and the other assumed that the groundwater will be at a depth of 8 feet of the ground surface where ground water was encountered.

Analysis of the settlement associated with a groundwater level of 5 feet with the PGA of 10 percent probability of exceedance in 50 years (475-year return interval) indicates that total settlement of 0.24 inches may occur. Based upon Feffer Geological Consulting review, the Project Site settlement for a return interval of 475-or 2475 years does exceed the total combined or differential settlement (seismic plus static) of 1.5 inch total or 0.75-inch differential specified by the City of Los Angeles. LADBS reviewed the Geotechnical Report and found that the liquefaction analysis demonstrates that the earthquake induced total and differential settlements would be within acceptable levels and that the requirements of the Building Code have been satisfied by the liquefaction analysis and associated Geotechnical Investigation recommendations.

Furthermore, the Project would not propose deep mining operations or boring into the Earth's crust into a known fault that could otherwise cause in whole or in part seismic-related ground failure. Additionally, LADBS would review the plans for consistency with the findings and recommendations of Geotechnical Investigation and the Building Code. LADBS would require that a *Final Geotechnical Engineering Investigation*, incorporating all findings and recommendations, be prepared and approved prior to the issuance of any grading or building permits. Therefore, impacts related to seismic-related ground failure including liquefaction would be less than significant and no mitigation measures are required.

(iv) Landslides?

No Impact. A significant impact may occur if a project is located in a hillside area with soil conditions that would suggest a high potential for sliding that could be exacerbated by a project.

⁵⁵ Feffer Geological Consulting, Inc., *Geotechnical Investigation*, May 18, 2017.

The Project Site is not located within an area identified by the City as having a potential for landslides, or of a known landslide.⁵⁶ The topography of the Project Site and surrounding area is relatively flat. The Project Site is not in the path of any known or potential landslides. As such, the Project would directly or indirectly expose people or structures to risk related to landslides. Therefore, no impacts would occur, and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact would occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time.

The Project Site is currently vacant and nearly the entire 2.14-acre Project Site is paved with impervious surfaces. The area surrounding the Project Site is developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion is unlikely to occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in the required SWPPP, which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

The potential for soil erosion during operation of the Project is low due to the fact that the Project Site would be almost entirely paved and/or landscaped. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the proposed buildings and paving while the remaining portions of the Project Site would be covered with irrigated landscaping. No exposed areas subject to erosion would be created or affected by the Project as pad and roof drainage would be collected and transferred to the street or approved location in non-erosive drainage devices as required by applicable regulations. Therefore, with implementation of the applicable grading and building requirements, impacts associated with soil erosion or loss of topsoil would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above.

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

⁵⁶ *Feffer Geological Consulting, Inc., Geotechnical Investigation, May 18, 2017.*

include those with high silt or clay content. The Project Site is underlain by artificial fill and Quaternary Age Alluvium (Qa) earth materials.⁵⁷ The Project Site is 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 Site or in the general Project Site vicinity. The Project Site is not located over an old mine or a cave and will not induce an earthquake as explained above. Therefore, the Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project. In addition, groundwater and petroleum are not currently being extracted from the Project Site and would not be extracted as part of the Project. Thus, subsidence as a result of such activities would not occur. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site. Furthermore, safe construction practices would be exercised through required compliance with the City Building Code and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to Project Site conditions.

Artificial fill consisting of silty clay and gravelly silty sand was encountered on the Project Site in borings between 2 and 12 feet in depth.⁵⁸ The fill is likely the result of past grading, construction, and operation activities at the Project Site. Native soil (Qa) was encountered beneath the fill consisting of admixtures of gravelly-sands, sandy-clays and silty-sands, which vary from brown to medium-brown, orange brown, blue-gray, and charcoal-gray. Laboratory testing conducted as part of the Geotechnical Investigation indicates that the Qa at a shallow depth has a low potential for consolidation and hydrocollapse. The Geotechnical Investigation found that the alluvium at the Project Site is competent and capable of supporting engineered structures and appurtenances. The Project would be required to incorporate the recommendations of the Geotechnical Investigation and LADBS as part of the Project approval and building permit process.

The Project would not be located on a geologic unit or on soil that is unstable, or that would become unstable as a result of the Project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to soil stability would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings, thus posing a hazard to life and property.

The Geotechnical Investigation determined that near surface soil on the Project Site was found to possess medium expansive characteristics based upon field soil classifications and testing. Construction of the Project would be required to comply with the City Building Code (2017 Amendments) and the 2016 California Building Code, which include building foundation requirements appropriate to site-specific conditions. The Geotechnical Investigation states that

⁵⁷ Feffer Geological Consulting, Inc., *Geotechnical Investigation, May 18, 2017.*

⁵⁸ Feffer Geological Consulting, Inc., *Geotechnical Investigation, May 18, 2017.*

foundations for the Project buildings will be founded in alluvium. With compliance with the regulatory requirements of the California Building Code, City of Los Angeles Building Code and site-specific recommendations in the Geotechnical Investigation, impacts associated with expansive soils would be less than significant and no mitigation measures are required.

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

No Impact. A significant impact may occur if a project is located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts would occur, and no mitigation is required.

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

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with a project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

No unique geologic features are located on the Project Site, which is a vacant and paved lot. The Project Site and immediate surrounding area do not contain any known vertebrate paleontological resources.⁵⁹ The Project Site and surroundings are within an area identified as surface sediments with unknown fossils potential.⁶⁰ Although the Project Site has been previously disturbed, and no paleontological resources have been identified on the Project Site or in the vicinity, the Project would require additional ground disturbance. If previously unknown paleontological resources are inadvertently found during Project construction activities including excavation and grading, the Project would be required to follow procedures as detailed in PRC Sections 5097.5 and 30244. Therefore, through compliance with existing State regulations related to paleontological resources, impacts to unknown paleontological resources that could be inadvertently discovered at the Project Site would be less than significant, and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the related projects with respect to the topics listed in the geology and soils analysis above, including seismicity, landslides, loss of topsoil, soil stability, fault rupture, etc. Geological hazards are site-specific and there is little, if any, cumulative relationship between a project and other nearby

⁵⁹ *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles.*

⁶⁰ *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles.*

projects. Nonetheless, cumulative development in the Project vicinity would increase the overall population in the area, thus, increasing the potential risk of exposure to seismically-induced hazards. However, with adherence to applicable local, State, and federal regulations, building codes, comprehensive engineering practices, and site-specific design considerations, geologic hazards would be less than significant. Therefore, cumulative impacts would be less than significant and no mitigation measures are required.

8. Greenhouse Gas Emissions

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

The following analysis is based on the findings of the *Thatcher Yard Residential Greenhouse Gas Analysis* (“GHG Report”) prepared by Urban Crossroads for the Thatcher Yard Project, March 1, 2019 (the report is available as Appendix D to this document).

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

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds or a project is inconsistent with local and Statewide goals and policies aimed at reducing the generation of GHG emissions.

The City has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MTCO₂e per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is widely accepted by the City of Los Angeles and numerous cities in the SCAB and is based on the SCAQMD staff’s proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD’s Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (“SCAQMD Interim GHG Threshold”). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required.⁶¹

As shown in Table V-8, the Project will result in approximately 995.88 MTCO₂e per year; the Project would not exceed the SCAQMD/City’s screening threshold of 3,000 MTCO₂e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

⁶¹ South Coast Air Quality Management District. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.* [Online] [http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significancethresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significancethresholds/ghgboardsynopsis.pdf?sfvrsn=2).

**Table V-8
Total Project Greenhouse Gas Emissions (Annual)**

Emissions	Emissions (metric tons per year)			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Annual construction-related emissions amortized over 30 years	25.53	0.00	0.00	25.63
Area	25.19	2.05E-03	4.30E-04	25.37
Energy	467.76	0.01	3.33E-03	469.02
Mobile Sources	346.43	0.02	0.00	346.88
Waste	19.75	1.17	0.00	48.94
Water	73.24	0.21	5.26E-03	80.05
Total CO₂e (All Sources)	995.88			
SCAQMD Screening Threshold (CO₂e)	3,000			
Threshold Exceeded?	NO			
<i>Source: CalEEMod™ model output, See Appendix 3.1 of the GHG Report for detailed model outputs. Note: Totals obtained from CalEEMod™ and may not total 100% due to rounding. Table results include scientific notation. e is used to represent times ten raised to the power of (which would be written as x 10^b) and is followed by the value of the exponent.</i>				

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. A significant impact would occur if a proposed project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Applicable plans adopted for the purpose of reducing GHG emissions include the CARB Scoping Plan (2008 and 2017 Scoping Plans) and the City of Los Angeles Sustainable City pLAN, discussed below.

Consistency with Scoping Plan (AB 32)

CARB's Scoping Plan identifies strategies to reduce California's GHG emissions in support of Assembly Bill (AB) 32 which requires the State to reduce its GHG emissions to 1990 levels by 2020. Many of the strategies identified in the Scoping Plan are not applicable at the project level, such as long-term technological improvements to reduce emissions from vehicles. Some measures are applicable and supported by the Project, such as energy efficiency. Finally, while some measures are not directly applicable, the Project would not conflict with their implementation.

Reduction measures are grouped into 18 action categories, as follows:

- 1. California Cap-and-Trade Program Linked to Western Climate Initiative Partner Jurisdictions.** Implement a broad-based California cap-and-trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater

environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.

2. **California Light-Duty Vehicle Greenhouse Gas Standards.** Implement adopted Pavley standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.
3. **Energy Efficiency.** Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).
4. **Renewables Portfolio Standards.** Achieve 33 percent renewable energy mix statewide.
5. **Low Carbon Fuel Standard.** Develop and adopt the Low Carbon Fuel Standard.
6. **Regional Transportation-Related GHG Targets.** Develop regional GHG emissions reduction targets for passenger vehicles.
7. **Vehicle Efficiency Measures.** Implement light-duty vehicle efficiency measures.
8. **Goods Movement.** Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.
9. **Million Solar Roofs Program.** Install 3,000 megawatts of solar-electric capacity under California's existing solar programs.
10. **Medium- and Heavy-Duty Vehicles.** Adopt medium- (MD) and heavy-duty (HD) vehicle efficiencies. Aerodynamic efficiency measures for HD trucks pulling trailers 53-feet or longer that include improvements in trailer aerodynamics and use of rolling resistance tires were adopted in 2008 and went into effect in 2010.⁵ Future, yet to be determined improvements, includes hybridization of MD and HD trucks.
11. **Industrial Emissions.** Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.
12. **High Speed Rail.** Support implementation of a high-speed rail system.
13. **Green Building Strategy.** Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.
14. **High Global Warming Potential Gases.** Adopt measures to reduce high warming global potential gases.

15. **Recycling and Waste.** Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials, and mandate commercial recycling. Move toward zero-waste.
16. **Sustainable Forests.** Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation. The 2020 target for carbon sequestration is 5 million MTCO₂e/yr.
17. **Water.** Continue efficiency programs and use cleaner energy sources to move and treat water.
18. **Agriculture.** In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.

Table V-9 summarizes the Project's consistency with the State Scoping Plan. As summarized, the Project will not conflict with any of the provisions of the Scoping Plan and in fact supports seven of the action categories through energy efficiency, water conservation, recycling, and landscaping.

**Table V-9
Scoping Plan Consistency Summary**

Action	Supporting Measures	Consistency
Cap-and-Trade Program	--	Not Applicable. These programs involve capping emissions from electricity generation, industrial facilities, and broad scoped fuels. Caps do not directly affect residential projects.
Light-Duty Vehicle Standards	T-1	Not Applicable. This is a statewide measure establishing vehicle emissions standards.
Energy Efficiency	E-1 E-2 CR-1 CR-2	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with 2016 CALGREEN requirements.
Renewables Portfolio Standard	E-3	Not Applicable. Establishes the minimum statewide renewable energy mix.
Low Carbon Fuel Standard	T-2	Not Applicable. Establishes reduced carbon intensity of transportation fuels.
Regional Transportation-Related Greenhouse Gas Targets	T-3	Not Applicable. This is a statewide measure and is not within the purview of this Project.
Vehicle Efficiency Measures	T-4	Not Applicable. Identifies measures such as minimum tire-fuel efficiency, lower friction oil, and reduction in air conditioning use.
Goods Movement	T-5 T-6	Not Applicable. Identifies measures to improve goods movement efficiencies such as advanced combustion strategies, friction reduction, waste heat recovery, and electrification of accessories. While

		these measures are yet to be implemented and will be voluntary, the proposed Project would not interfere with their implementation.
Million Solar Roofs (MSR) Program	E-4	Not Applicable. The MSR program sets a goal for use of solar systems throughout the state as a whole. The project currently does not include solar energy generation, and it is unknown if the building roof structure will be designed to support solar panels in the future.
Medium- & Heavy-Duty Vehicles	T-7 T-8	Not Applicable. MD and HD trucks and trailers accessing the Project will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the Project would interfere with implementation of these requirements and programs.
Industrial Emissions	I-1 I-2 I-3 I-4 I-5	Not Applicable. These measures are applicable to large industrial facilities (> 500,000 MTCO ₂ e/yr) and other intensive uses such as refineries.
High Speed Rail	T-9	Not Applicable. Supports increased mobility choice.
Green Building Strategy	GB-1	Consistent. The Project will include a variety of building, water, and solid waste efficiencies consistent with 2016 CALGREEN requirements.
High Global Warming Potential Gases	H-1 H-2 H-3 H-4 H-5 H-6 H-7	Not Applicable. The proposed Project is not a substantial source of high GWP emissions and will comply with any future changes in air conditioning, fire protection suppressant, and other requirements.
Recycling and Waste	RW-1 RW-2 RW-3	Consistent. The Project will recycle a minimum of 50 percent from construction activities and operations pursuant to AB 939 and AB 75 requirements.
Sustainable Forests	F-1	Consistent. The Project will increase carbon sequestration by increasing on-site trees per the Project landscaping plan.
Water	W-1 W-2 W-3 W-4 W-5 W-6	Consistent. The Project will include use of low-flow fixtures and efficient landscaping pursuant to 2016 CalGreen requirements.
Agriculture	A-1	Not Applicable. The Project is not an agricultural use.
<p><i>NOTE: Supporting measures can be found at the following link: https://www.arb.ca.gov/cc/scopingplan/2013_update/appendix_b.pdf Table Source: Urban Crossroads, Thatcher Yard Residential Greenhouse Gas Analysis, (GHG Report) March 1, 2019.</i></p>		

As shown above, the Project would be consistent with the applicable measures established in the Scoping Plan.

Consistency with SB 32

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05, to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project, as analyzed above, is consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 are too far in the future to define in detail." In the First Scoping Plan Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; largescale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."

Unlike the 2020 and 2030 reduction targets of AB 32 and SB 32, respectively, the 2050 target of Executive Order S-3-05 has not been codified, so the 2050 reduction target has not been the subject of any analysis by CARB. For example, CARB has not prepared an update to the aforementioned Scoping Plan that provides guidance to local agencies as to how they may seek to contribute to the achievement of the 2050 reduction target.

In 2017, the California Supreme Court examined the need to use the Executive Order S-3-05 2050 reduction target in *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (Cleveland National). The case arose from SANDAG's adoption of its 2050 Regional Transportation Plan, which included its Sustainable Communities Strategy, as required by SB 375 (discussed above). On review, the Supreme Court held that SANDAG did not violate CEQA by not considering the Executive Order S-3-05 2050 reduction target. Accordingly, since the Project is much smaller in size and scope in comparison to the Regional Transportation Plan examined in *Cleveland National*, assessing the Project's consistency with regard to the 2050 target of Executive Order S-3-05 is not necessary for determining compliance with CEQA.

The 2017 Scoping Plan builds on the 2008 Scoping Plan in order to achieve the 40 percent reduction from 1990 levels by 2030. Major elements of the 2017 Scoping Plan framework that will achieve the GHG reductions include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing Zero Emission Vehicle (ZEV) buses and trucks. When adopted, this measure would apply to all trucks accessing the Project site; this may include existing

trucks or new trucks purchased by the project proponent, which could be eligible for incentives that expedite the Project's implementation of ZEVs.

- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030). When adopted, this measure would apply to all fuel purchased and used by the Project in the state.
- Implementing SB 350, which expands RPS to 50 percent and doubles energy efficiency savings by 2030. When adopted, this measure would apply when electricity is provided to the Project by a utility company.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZEV trucks. When adopted, this measure would apply to all trucks accessing the Project site, this may include existing trucks or new trucks that are part of the statewide goods movement sector.
- Implementing the proposed Short-Lived Climate Pollutant Strategy (SLPS), which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030. When adopted, the Project would be required to comply with this measure and reduce SLPS accordingly.
- Continued implementation of SB 375. The Project is not within the purview of SB 375 and would therefore not conflict with this measure.
- Post-2020 Cap-and-Trade Program that includes declining caps. When adopted, the Project would be required to comply with the Cap-and-Trade Program if it generates emissions from sectors covered by Cap-and-Trade.
- 20 percent reduction in GHG emissions from refineries by 2030. When adopted, the Project would be required to comply with this measure if it were to utilize any fuel from refineries.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink. This is a statewide measure that would not apply to the Project.

As shown above, the Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030.⁶²

⁶² *California Legislative Information, Senate Bill No. 32, [Online] September 8, 2016. https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB32.*

City of Los Angeles Sustainable City pLAN

The project would be required to comply with the Title 24 requirements and would be therefore be consistent with the goals and initiatives of set forth by the Sustainable City pLAN.

The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant, and no mitigation is required.

Cumulative Impacts

Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The state has mandated a goal of reducing state-wide emissions by 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050, even though state-wide population and commerce is expected to grow substantially. As discussed above, the Project will result in approximately 995.88 MTCO₂e per year, below the SCAQMD/City's screening threshold of 3,000 MTCO₂e per year. The Project would also not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. Additionally, given the Project's compliance with the CALGreen Code and Los Angeles Green Building Code, proximity to transit and urban location, the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs. For these reasons, the contribution of the Project to the cumulative effect of global climate change is not considered to be cumulatively considerable. It is also assumed that the related projects would comply with the applicable provisions of the CalGreen Code and the City of Los Angeles Green Building Program Ordinance, which would help to reduce their contributions to cumulative climate change impacts. Therefore, the Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

9. Hazards and Hazardous Materials

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

The following analysis is based on the findings of the *Subsurface Site Assessment – Phase II Geophysical, Soil, Soil Vapor, & Updated Groundwater Survey* (Phase II) prepared by California Environmental Geologists & Engineers, Inc., November 2018. A copy of this report is available as Appendix E to this document.

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. A significant impact may occur if a project involves transport, use or disposal of hazardous materials as part of its routine operations and as a result would create a significant hazard to the public or environment.

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in residential developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials are reasonably anticipated to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced through compliance with these standards and regulations. Furthermore, there are no Aboveground Storage Tanks (AST's) and no Underground Storage Tanks (USTs) located on the Project Site. Therefore, the Project would not create 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 and no mitigation measures are required.

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. A significant impact may occur if a project could potentially pose a hazard to nearby sensitive receptors by releasing hazardous materials into the environment through accident or upset conditions.

California Environmental prepared a Preliminary Phase I Environmental Site Assessment for the Project Site, which determined that recognized environmental conditions (RECs) were ascertained in connection with the site. Based on this historic data, additional site assessment research and subsurface activities were recommended for the subject property. A Phase II Environmental Site Assessment (Phase II) was conducted by California Environmental in November 2018 (see Appendix E to this document).

Review of previous site assessment reports determined that the Project Site (3233 and 3311 Thatcher Avenue) has been occupied by the City since the 1950s-1960s. The southern portion of the Project Site (3311 Thatcher Avenue) was originally unpaved in the early 1960s, at a slightly lower elevation. This area was utilized as a transfer station, but has since been backfilled to the present grade and paved. Trash and refuse consisting of broken glass, wires, wood, metal, plastic, and brick fragments were identified between two and eight feet below ground surface beneath the eastern portion of the property.

In August 1987, one (1) 1,000-gallon and two (2) 550-gallon underground diesel storage tanks were removed from the property. The 1,000-gallon underground storage tank was located beneath the eastern portion of the City of Los Angeles Wastewater Collection System Division

(WCSD) Training Facility (3233 Thatcher Avenue). Two (2) 550-gallon underground storage tanks were previously located between the former office and housing structure on the Bureau of Street Maintenance Yard (3311 Thatcher Avenue) property. NorCal Engineering collected soil samples beneath the tank inverts under the supervision of the City of Los Angeles Fire Department. Low-level diesel impacts (up to 620 ppm) were found beneath the 550-gallon USTs. No detectable fuel hydrocarbons were found beneath the 1,000-gallon UST.

In 1989, IT Corporation excavated eleven (11) borings (B1-B11) as part of an assessment for the two (2) 550-gallon USTs. Groundwater was encountered between 7.0 and 13.0 feet below ground surface. IT Corporation, the Los Angeles City Bureau of Standards, and ALT installed eleven (11) groundwater-monitoring wells (MW12-MW22) beneath the Bureau of Street Maintenance parking lot in 1988 through 1991. A Corrective Action Plan was submitted to the RWQCB in May 1993. Groundwater monitoring continued through 1996. A UST Closure letter was issued for the UST release by the RWQCB on November 19, 1996. No further action regarding the underground storage tank release was required. The RWQCB required additional assessment and potentially clean-up of chlorinated volatile organic compounds and pesticide impacts. Biannual groundwater monitoring was initiated from February 1995 to the present.

The *Biannual Groundwater Monitor Report – 2nd Quarter 2001*, prepared by URS, indicated that laboratory analysis found no detectable total petroleum and/or aromatic hydrocarbons in the eleven (11) groundwater monitoring wells. Methyl tert-Butyl Ether (MtBE) was found during this sampling event in monitoring well (MW) 17 at 4.2 µg/L. Concentrations of polychlorinated biphenyl (PCB) (up to 1.3 µg/L), Trichloroethene (TCE) (up to 16.0 µg/L), cis-1,2- Diethylcyclopropane (DCE) (up to 19.0 µg/L), 1,4-DCE (1.4.0 µg/L), trans 1,2-DCE (up to 6 .6 µ g/L), and vinyl chloride (up to 6 3.0 µ g/L) were also reported during this sampling event.

Geophysical Survey

Spectrum Geophysics conducted a geophysical survey under the direction of California Environmental on March 7, 2002. The purpose of the geophysical survey was to delineate potential USTs, metallic debris, and to clear utilities. Total field magnetics and ground penetrating radar were used to identify the near surface debris and utilities. The geophysical survey identified four areas of near surface debris. The locations of the anomalies are depicted on the Spectrum Geophysical Field Report and contour maps attached as Appendix III to the Phase II (see Appendix E to this document). No anomalies suggestive of underground steel storage tanks were identified on the Project Site.

Soil Vapor Sampling

A soil vapor survey was conducted onsite on March 12, 2002 by HydroGeoSpectrum under the direction of California Environmental. Nineteen (19) soil vapor samples were collected from the nineteen (19) soil vapor probes. The soil vapor samples were analyzed for fuel hydrocarbons, volatile organic compounds, and fixed gases (methane, CO₂) per EPA Methods 8015 and 8260. Hydrogen sulfide, carbon monoxide, methane, Volatile Organic Compounds (VOCs), and oxygen were analyzed in the field using a Multi-RAE five-gas analyzer.

Laboratory analyses detected petroleum hydrocarbons (gasoline range) in four (4) of the nineteen (19) soil vapor samples. The highest concentration of Total Petroleum Hydrocarbons (TPH) (up to 43 µg/L) was found in soil vapor sample (SV) 4 at 3 feet. Low levels of vinyl chloride (up to 5.8 µg/L), TCE (up to 0.5 µg/L), PCB (up to 7.6 µg/L), and benzene (up to 1.2 µg/L), were found in soil vapor beneath the Project Site. Methane gas (up to 10.7%) was found with the fill deposit. No detectable methane concentrations were found on the WCSO facility site. Up to 12 percent (LEL - lower explosive level) methane was detected using the Multi-Rae PID within SV1. The laboratory and field tests are included as appendices to the Phase II (see Appendix E to this document).

Soil Sampling

Ten (10) borings were excavated on the Project Site on March 13, 2002 using a hydraulic push rig. The maximum depth of borings was sixteen (16) feet bgs. The samples were analyzed for total petroleum hydrocarbons, aromatic hydrocarbons, metals, volatile organic compounds, semi-volatile organic compounds, and herbicides/pesticides/PCBs per EPA methods 8015, 8020, 7420, 8260, 8270, 8081, and 8082. Fuel hydrocarbons and heavy oil hydrocarbons were found in the soil samples. Acetone (up to 120 µg/Kg) was found in four (4) of the ten (10) borings. No other volatile organic compounds, semi-volatile organic compounds and/or pesticides/PCB's were found in the soil. The laboratory analyses identified elevated levels of lead (up to 9,300 mg/Kg) and zinc (1,400 mg/Kg) within the area of artificial fill. All other metals were within typical background levels. The results of the soil sampling are included as appendices to the Phase II (see Appendix E to this document).

Groundwater Sampling

Seven (7) groundwater monitor wells were gauged and sampled by Blaine Tech under the direction of California Environmental on August 16, 2018. The sampling activities included the measurement of the groundwater elevations, removal of groundwater using a low flow bladder pump, monitoring of field stabilization parameters, and the collection of groundwater samples from the groundwater monitor wells. The groundwater samples were tested for TPH, VOCs, Title 22 Metals, organochlorine pesticides, pH, chloride, sulfate, nitrate, magnesium, sodium and calcium.

Laboratory analysis of groundwater from wells monitoring well (MW) 17 and MW20 revealed concentrations of TPH gas (primarily diesel range) at 820 and 1,000 µg/L, respectively. Low concentrations of TCE and 1,2-DCE were detected in MW18 at 3.2 and 2.7 µg/L, respectively. No other VOCs were detected in the samples collected. Chloride detected in the groundwater samples ranged from 12 to 250 mg/L and nitrate ranged from non-detect to 1.3 mg/L. The samples collected ranged from slightly acidic (pH 6.37) to neutral (pH 7.1). Metals detected in groundwater included arsenic (<0.01 to 0.0228 mg/L), barium (0.061 to 0.398 mg/L), selenium (<0.015 to 0.0242 mg/L), thallium (<0.015 to 0.0295 mg/L), and zinc (0.0186 to 0.0761 mg/L). Nickel was detected in wells MW15 and MW18 at 0.0116 and 0.0143 mg/L, respectively. Vanadium was detected in wells MW17 and MW20 at 0.0126 and 0.0108 mg/L, respectively. All concentrations of metals detected are greatly below their respective maximum contaminant level (MCL). No pesticides were detected in samples collected. The tabulated data and laboratory test report are included as appendices to the Phase II (see Appendix E to this document).

Phase II Conclusions and Recommendations

As part of the Project, either removal or penetration of the artificial fill prism present on the southeastern portion of the property (3311 Thatcher Avenue) will be performed. The fill deposit extends to depths of 10 feet and typically contains debris consisting of glass, asphalt, concrete, and organics. Analysis of soil vapor extracted from within the fill deposit reveal pockets of methane greater than 10 percent by volume. The methane within the fill is likely generated through biologic breakdown of organic debris. Typically non-detect to very low levels of methane were found outside the area of the fill deposit. The methane hazard can be mitigated through either removal of the organic rich artificial fill deposit or through the use of a subslab methane collection and abatement system. A vent cone and membrane will be required by LADBS for construction over the onsite abandoned oil core hole. Remediation of the fill deposit on the Project Site is required by Mitigation Measure HAZ-1 and will ensure that all methane pockets within the fill deposit are removed from the site and would not pose a hazard.

With regard to methane detected outside of the fill deposit, the Project Site is located within a City-designated methane zone that mandates implementation of methane mitigation measures, depending on conditions at the Project Site. The Project would be required to comply with the General Methane Mitigation Requirements pursuant to Section 91.7103 of the LAMC. Thus, prior to construction, methane gas concentrations and subsurface pressures would be measured by qualified and certified personnel. If methane gas is detected on the Project Site at pressures and/or concentrations of concern, these conditions would be addressed accordingly through compliance with existing City regulations. Compliance with the regulations governing methane gas and methane zones in the City (Section 91.7103 of the LAMC) would ensure that potential impacts would be less than significant; no mitigation measures are required.

Elevated levels of petroleum hydrocarbons and lead were detected within the fill deposit. Up to 6,200 mg/Kg of total petroleum hydrocarbons were detected within the fill deposit. Up to 9,300 mg/Kg of lead were also found. The average concentration of lead in soil for the 29 samples analyzed from within the fill prism approaches 950 mg/Kg. Total lead levels which exceed 1,000 mg/Kg are considered hazardous waste in the State of California. Additional characterization of the lead impacted soil is required to determine the appropriate disposal point. In addition, the eleven on-site groundwater monitoring wells would be removed upon LARWQCB closure of the site. A site remediation plan for the impacted soil will be presented to the LARWQCB for approval prior to implementation and is included as Mitigation Measure MM HAZ-1. Incorporation of MM HAZ-1 would ensure that potential impacts related to lead would be less than significant.

The City of Los Angeles requested sign-off from the RWQCB regarding the requirement for additional assessment associated with pesticides and solvents (PCE and TCE) in groundwater. Low concentrations of TCE and 1,2-DCE were detected in MW18 at 3.2 and 2.7 µg/L, respectively during August 2018. The current concentrations of solvent detected are below the current drinking water standards. It is unlikely groundwater remediation will be required based on the results of the recent groundwater sampling, which will be determined by the RWQCB upon closure of the site.

As discussed in Section IV., RTP/SCS Program EIR Mitigation Measures, the Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measures MM RTP/SCS HAZ-1(b) and MM RTP/SCS HAZ-4(b). In addition, the Project includes the following project-specific mitigation measures. The Project-specific mitigation measures fulfil the RTP/SCS mitigation measures and go beyond the scope of the RTP/SCS measures.

Mitigation Measures

MM HAZ-1. The artificial fill prism present on the southeastern portion of the property (3311 Thatcher Avenue) shall be removed as required by the geotechnical engineer for foundation support and as required to mitigate the presence of lead in the fill prior to construction of the proposed buildings. After removal of the approximately 10 feet of fill deposit, a vent cone and membrane system shall be installed and approved by LADBS over the onsite abandoned oil core hole.

MM HAZ-2. A site remediation plan shall be developed to address potentially elevated concentrations of lead within the fill deposit at the Project Site. The plan shall address removal of the potentially impacted soil, characterization of the potentially impacted soil, and identification of appropriate disposal. The remediation plan shall also address removal of the on-site groundwater monitoring wells on the Project Site. This remediation plan shall be reviewed and approved by the RWQCB prior to implementation.

With implementation of mitigation measures MM HAZ-1 and HAZ-2, potentially significant hazardous impacts to the public or the environment through upset or accident conditions related to hazardous materials during construction and operation of the Project would be less than significant.

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

Less Than Significant Impact. A significant adverse effect may occur if a project is located within one-quarter mile of an existing or proposed school and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds. The nearest school to the Project Site is Westchester Charter School (4344 Promenade Way), approximately 0.28 miles from the Project Site. and is There are no known proposed schools within one-quarter mile. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of residential uses (e.g., cleaning solutions, solvents, painting supplies, batteries, etc.). However, it is reasonably anticipated that all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, State, and local regulations. As such, the use of such materials would not create a significant hazard to any nearby schools. Additionally, as discussed above under Question (a),

the Project is not expected to result in hazardous emissions. Therefore, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant with Mitigation Incorporated. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

According to California Department of Toxic Substances Control's (DTSC) EnviroStor database, the Project Site is listed as a leaking underground storage tank (LUST) site.⁶³ As discussed under Question 9.b, at least three (3) underground storage tanks (USTs) had been previously located on and removed from the Project Site. In August 1987, one (1) 1,000-gallon and two (2) 550-gallon underground diesel storage tanks were removed from the property. The 1,000-gallon underground storage tank was located beneath the eastern portion of the WCSD Training (3233 Thatcher Avenue) facility. Two (2) 550-gallon underground storage tanks were previously located between a former office and former housing structure on the Bureau of Street Maintenance Yard (3311 Thatcher Avenue) property. Soil samples were collected from beneath the tank inverts under the supervision of the City of Los Angeles Fire Department. Low-level diesel impacts (up to 620 ppm) were found beneath the 550-gallon USTs. No detectable fuel hydrocarbons were found beneath the 1,000-gallon UST.

In 1989, IT Corporation excavated eleven (11) borings (B1-B11) as part of an assessment for the two (2) 550-gallon USTs. Groundwater was encountered between 7.0 and 13.0 feet below ground surface. IT Corporation, the Los Angeles City Bureau of Standards, and ALT installed eleven (11) groundwater-monitoring wells (MW12-MW22) beneath the Bureau of Street Maintenance parking lot in 1988 through 1991. A Corrective Action Plan was submitted to the RWQCB in May 1993. Groundwater monitoring continued through 1996. A UST Closure letter was issued for the UST release by the RWQCB on November 19, 1996. No further action regarding the underground storage tank release was required. The RWQCB required additional assessment and potentially clean-up of chlorinated volatile organic compounds and pesticide impacts. Biannual groundwater monitoring was initiated from February 1995 to the present.

As the RWQCB issued a closure letter in 1996, the previous storage tanks located on and removed from the Project Site do not pose a hazard to the public or the environment. As also discussed under Question 9.b, mitigation measures HAZ-1 and HAZ-2 are required to mitigate potential impacts related to methane concentrations on the Project Site and to create a site

⁶³ California Department of Toxic Substances Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed: April 2019.

remediation plan for potential lead concentrations within soil on the Project Site. The LUST listing for the Project Site would remain closed and with implementation of the required mitigation measures, the Project would not create a significant hazard to the public or the environment.

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

No Impact. The nearest airport to the Project Site is the Santa Monica Airport, which is located approximately two miles to the north of the Project Site. Los Angeles International Airport (LAX) is located approximately three miles south of the Project Site. However, the Project Site is not located within the Airport Influence Area of either the Santa Monica Airport nor Los Angeles International Airport.⁶⁴ Therefore, no impacts would occur, and no mitigation measures are required.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards if a project involved possible interference with an emergency response plan or emergency evacuation plan.

There are no critical facilities or lifeline systems in the immediate vicinity of the Project Site.⁶⁵ None of the roadways that run adjacent to the Project Site (Thatcher Avenue, Princeton Drive, or Oxford Avenue) are identified as a disaster route by either the City,⁶⁶ or by Los Angeles County.⁶⁷ Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is a County- and City-designated disaster route.⁶⁸ Nonetheless, as discussed under threshold question 17.a), below, the Project would not result in any significant traffic impacts. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. An emergency response plan would be submitted to LAFD during review of plans as part of the standard building permit process. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways, including Lincoln Boulevard, would be impeded. Access for emergency service providers and any

⁶⁴ Los Angeles County Airport Land Use Commission, *Airports and Airport Influence Areas, June 2012*, website: http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf, accessed: April 2019.

⁶⁵ City of Los Angeles Department of City Planning, *Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996*.

⁶⁶ City of Los Angeles Department of City Planning, *Los Angeles City General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996*.

⁶⁷ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map*, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019.

⁶⁸ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map*, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996*.

evacuation routes would be maintained during construction and operation. Therefore, impacts would be less than significant and no mitigation measures are required.

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

No Impact. A significant impact would occur if a project site is located near wildland areas and poses a significant fire hazard, which could affect persons or structures in the area in the event of a fire.

The Project Site is located within an urbanized area of the City and there are no nearby wildlands or high fire hazard terrain or natural vegetation. Additionally, the Project Site is not within a Very High Fire Hazard Severity Zone,⁶⁹ nor is the Project Site or surrounding area within a wildland fire hazard area.⁷⁰ Therefore, the Project would not directly or indirectly expose people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts related to wildland fires would be less than significant, and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impacts of the Project and the 21 related projects with respect to the topics listed in the hazards and hazardous materials analysis above, including the transport of hazardous materials, upset and accident conditions, handling of hazardous materials, etc. The cumulative impacts study area for hazardous materials is the extent of the related projects.

Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant and, therefore, would not substantially contribute to a cumulative impact. Furthermore, the related projects will be required to follow local, State, and federal laws regarding hazardous materials. With compliance with local, State, and federal laws pertaining to hazardous materials, cumulative impacts to hazardous materials would be less than significant and no mitigation measures are required.

⁶⁹ *City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: June 15, 2018.*

⁷⁰ *City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles, Adopted November 1996.*

10. Hydrology and Water Quality

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

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

Construction

Construction activities associated with the Project has the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the “Los Angeles County MS4 Permit”), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.⁷¹ ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan (SWPP). Pursuant to the existing requirements, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project and relocation of the house would be less than significant and no mitigation measures are required.

Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.⁷² This program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) adopted by LARWQCB. As a permittee, the City is

⁷¹ *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.*

⁷² *California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 97 et seq.*

responsible for implementing the requirements of the County-wide SUSMP within its boundaries. A Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's LID Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff, reduce stormwater runoff, promote rainwater harvesting, and provide increased groundwater recharge. In this regard, the City has established review procedures to be implemented by the DCP, LADBS, and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or included withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge.

The West Coast Basin is the groundwater basin that underlies the Project Site.⁷³ As part of the *Geotechnical Investigation* prepared by Feffer Geological Consulting, Inc. for the Project, groundwater was encountered at depths between eight and 15 feet below ground surface. The historically highest groundwater level recorded is five feet above grade.⁷⁴ Because existing groundwater seepage was encountered as part of the *Geotechnical Investigation* at a depth of 18 feet, groundwater may be encountered during construction of the subterranean level and

⁷³ *United States Geological Survey, Coastal Los Angeles Groundwater Basins Map, website: <https://www.usgs.gov/media/images/coastal-los-angeles-groundwater-basins-map>,*

⁷⁴ *Feffer Geological Consulting, Inc., Geotechnical Investigation, May 18, 2017.*

foundations. If groundwater is encountered, dewatering may be required and would be designed by a dewatering contractor and engineer with approval by LADBS.

Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports the majority of its potable water supply from sources outside the Los Angeles Basin. The Project would not extract groundwater or directly use wells. The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. Additionally, operation of the Project would not interfere with any groundwater recharge activities within the area. The Project Site is currently entirely paved with an impermeable surface. Thus, the degree to which surface water infiltration and groundwater recharge currently occurs on-site is negligible. Under the Project, the amount of impermeable surface area would be increased comparatively. Therefore, construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge and the Project would not impede sustainable groundwater management of the West Coast groundwater basin. Impacts would be less than significant and no mitigation measures are required.

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

(i) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project.

No stream or river traverses the Project Site. The entire Project Site and the majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site is relatively flat and grading on the site would not alter existing landforms or drainage patterns. As the Project Site is entirely paved, stormwater is conveyed via the existing drainage network on site to curb drains to the surrounding streets. During construction, grading and excavation would expose limited amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the project site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a SWPPP, which must be acceptable to the City and in compliance with the NPDES Stormwater Regulations.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by buildings and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. The Project's proposed landscaped areas would reduce stormwater runoff and reduce peak flows. No exposed areas subject to erosion would be created or affected by the Project. During operation, the Project would implement BMPs to ensure compliance with SUSMP and LID requirements. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial

erosion or siltation would occur. Therefore, impacts would be less than significant and no mitigation measures are required.

(ii) 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 project would normally have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

No stream or river traverses the Project Site. The Project Site is relatively flat and grading on the site would not alter existing landforms or drainage patterns. The Project Site is currently entirely paved with an impervious surface and vacant. The Project Site is not located adjacent to a stream or river. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site and vicinity are served by existing storm drains along the surrounding streets.

The Project would be required to comply with the City's LID Ordinance and the Project SUSMP. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. During operation, the Project would be required to control stormwater runoff using best management practices, including site specific measures incorporated into the final Project plans, which would be reviewed by the Bureau of Engineering (BOE) prior to issuance of grading and building permits. Thus, the Project would not substantially increase the rate or amount of surface runoff on the Project site in a manner which would result in flooding on- or off-site. Therefore, impacts would be less than significant and no mitigation measures are required.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily stormwater) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operation of the Project also has the potential to degrade water quality and/or waste discharge requirements. As discussed above, a SUSMP would be required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. In addition to the SUSMP, LID techniques would be required for the Project. Implementation of the required SUSMP and LID techniques would ensure these impacts would be less than significant. Therefore, impacts would be less than significant and no mitigation measures are required.

(iv) Would the Project impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X – Area of Minimal Flood Hazard, which is a designation for areas determined to be outside the 100-year flood hazard area.⁷⁵ Thus, the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures are required.

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

Less Than Significant Impact. Inundation of water, including through 100-year storm flooding, tsunami, seiche, can result in the release of pollutants as floodwaters that have encountered such pollutants (such as oil and grease deposits on driving surfaces, trash, and stored chemicals required for cleaning and maintenance) recede.

According to the FEMA's Flood Insurance Rate Map, the Project Site is within Zone X – Other Areas, which is a designation for areas determined to be outside the 100-year flood hazard area.⁷⁶ However, the Project Site is approximately 500 feet from the marina of Marina del Rey, which connects to the Pacific Ocean. The southern corner of the Project Site is a designated tsunami inundation area.⁷⁷

A *Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California* (SLR Report) was prepared for the Project by GeoSoils, Inc., on June 21, 2019 to address potential coastal hazards related to the Project. A copy of this report is available as Appendix F to this document.

According to the SLR Report, there are typically three different potential coastal hazards for coastal development: shoreline movement/erosion, waves and wave runup, and flooding. Because the Project Site is more than 1.25 miles from the ocean, the hazards of shoreline erosion and wave runup flooding are not possible. The site is too far away for shoreline erosion and wave runup to impact the site.⁷⁸

⁷⁵ Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1752F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: April 2019.*

⁷⁶ Federal Emergency Management Agency, *Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1752F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: April 2019.*

⁷⁷ California Emergency Management Agency, *California Geological Survey, University of Southern California, State of California, County of Los Angeles, Tsunami Inundation Map for Emergency Planning, Venice Quadrangle, March 1, 2019, website: https://www.conservation.ca.gov/cgs/documents/tsunami/maps/Tsunami_Inundation_Venice_Quad_LosAngeles.pdf, accessed April 2019.*

⁷⁸ GeoSoils, Inc., *Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California, June 21, 2019. See Appendix F to this document.*

Current Flooding Hazard

Some areas of Venice and Marina del Rey are relatively low lying and currently prone to flooding. The United States Geological Survey (USGS) has also developed a model called the Coastal Storm Modeling System (CoSMoS) for assessment of the vulnerability of coastal areas to sea level rise (SLR) and the 100-year storm. The modeling can be used to assess the flooding vulnerability of the site to different SLR scenarios. The CoSMoS shows there is no SLR vulnerability for the Project Site and area to flooding, specifically that the Project Site is well away from the shoreline, and not impacted by the marina or the low lying areas of Venice.⁷⁹ This is consistent with the current FEMA pending preliminary FEMA flood insurance rate map designation as an area of low flood risk.

Sea Level Rise

The California Coastal Commission (CCC) initially adopted the National Research Council (NRC) 2012 SLR estimates of 16.56 inches to 65.76 inches over the time period from 2000 to 2100. However, the NRC is no longer considered the best available science for assessing the magnitude of SLR in the marine science communities. The California Ocean Protection Council (OPC) adopted an update to the State's Sea-Level Rise Guidance in March 2018. This is the SLR data used in the CCC November 2018 SLR Policy Guidance update. These new estimates are based upon a 2014 report entitled "Probabilistic 21st and 22nd century sea-level projections at a global network of tide-gauge sites" (Kopp et al., 2014). This update included SLR estimates and probabilities for Santa Monica, the closest SLR estimates to Venice.

In May 2018 the City released a Venice Sea Level Rise Vulnerability Assessment completed by Moffatt & Nichol funded in part by the CCC.⁸⁰ The Assessment is part of the City's work program to prepare a Local Coastal Program (LCP) for the Venice Coastal Zone.

The USGS CoSMoS program can be used to establish SLR thresholds for flooding of the site, if no community/regional flooding mitigation action is taken. The SLR Report illustrates that at a SLR level of 4.9 feet, the Project Site would not flood; at an SLR level of 5.7 feet, the Project Site would flood based on current elevations; at an SLR of 6.6 feet, a large area of the Venice community would flood, including the Project Site. However, based on the flood depth provided by the CoSMoS model, potential flooding in the event of a 6.6-foot SLR would be less than 2 feet at the Project Site. The existing and proposed elevations (except the parking garage) of the Project Site are two feet or more above the adjacent street flow lines, and therefore the Project buildings would not flood even in the event of a 6.6-foot SLR.

The SLR Report concludes that Using the latest SLR projections, the maximum (0.5%) SLR over the next 75 years is approximately 5.6 feet. It is possible but not probable that SLR could be 6.15 feet in 75 years. The Project Site and adjacent areas are not currently vulnerable to flooding. The vulnerability of the Project Site to flooding may be increased with SLR. However, based upon the

⁷⁹ *GeoSoils, Inc., Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California, June 21, 2019. See Appendix F to this document.*

⁸⁰ *GeoSoils, Inc., Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California, June 21, 2019. See Appendix F to this document.*

CoSMoS modeling, SLR would need to be in excess of 6.0 feet before the proposed Project buildings (with the exception of the below grade parking) may be subject to flooding. The Project Site is too far away from the ocean to be subject to direct marine inundation. Therefore, inundation of water, including through flooding caused by SLR, would be unlikely. Furthermore, operation of the Project would involve the limited use of hazardous materials typically used in the maintenance of mixed-use projects incorporating residential uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies and petroleum products). As such, the Project would not risk release of pollutants due to flooding.

Tsunamis

Tsunami are waves generated by submarine earthquakes, landslides, or volcanic action. The maximum tsunami runup in the Venice Beach open coast area is less than 1 meter in height. Any tsunami that approaches the site in will be modified, and reduced in height by the development and tide gates as it travels towards the site. Due to the infrequent nature and the relatively low 500-year recurrence interval tsunami wave height, and the elevation of the proposed Project buildings, the Project Site is reasonably safe from tsunami hazards.⁸¹

The Project Site is mapped just outside the limits of the California Office of Emergency Services tsunami inundation map, Venice Quadrangle (State of California, 2009). The tsunami inundation maps are very specific as to their use. Their use is for evacuation planning only. The limitation on the use of the maps is clearly stated in the PURPOSE OF THIS MAP on every quadrangle of California coastline. In addition, the following paragraph is taken from the CalOES Local Planning Guidance on Tsunami Response concerning the use of the tsunami inundation maps:

Inundation projections and resulting planning maps are to be used for emergency planning purposes only. They are not based on a specific earthquake and tsunami. Areas actually inundated by a specific tsunami can vary from those predicted. The inundation maps are not a prediction of the performance, in an earthquake or tsunami, of any structure within or outside of the projected inundation area.

The CalOES maps model the inundation of a tsunami with an approximate 1,000 year recurrence interval (0.1% event). The CalOES modeling output shows that the Project Site is not within the tsunami inundation zone.⁸² The City of Los Angeles has clearly marked tsunami evacuation routes for the entire area, which would not be changed or impacted by the Project. Therefore, inundation of water, including through tsunami, would be unlikely. Furthermore, operation of the Project would involve the limited use of hazardous materials typically used in the maintenance of mixed-use projects incorporating residential uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies and petroleum products). As such, the Project would not risk release of pollutants due to tsunami.

⁸¹ GeoSoils, Inc., Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California, June 21, 2019. See Appendix F to this document.

⁸² GeoSoils, Inc., Sea Level Rise Hazard Discussion for 3221 -3233 Thatcher Avenue, Venice, Los Angeles, California, June 21, 2019. See Appendix F to this document.

Impacts would be less than significant, and no mitigation measures are required.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As detailed in 10.(a) above, the Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe) and would be required to prepare and implement a SUSMP, in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the Project. Additionally, in accordance with NPDES requirements, a SWPP would be developed and implemented during Project construction. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan.

As discussed in 10.(b) above, the Project would not extract groundwater or use wells. As part of the *Geotechnical Investigation* prepared by Feffer Geological Consulting, Inc. for the Project, groundwater was encountered at depths between eight and 15 feet below ground surface. The historically highest groundwater level recorded is five feet above grade.⁸³ Because existing groundwater seepage was encountered as part of the Geotechnical Investigation at a depth of 18 feet, groundwater may be encountered during construction of the subterranean level and foundations. If groundwater is encountered, dewatering may be required and would be designed by a dewatering contractor and engineer with approval by LADBS. Furthermore, there is no sustainable groundwater management plan governing the Project area.⁸⁴ Therefore, the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the hydrology and water quality analysis above. The cumulative impacts study area for hydrology and water quality is the extent of the related projects.

With respect to construction impacts, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to comply with the City Building Code and NPDES requirements. Assuming compliance, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with the related projects would result in the further infilling in an already developed area. As discussed above, the Project Site and the surrounding area are served by the existing City storm drain system. Runoff

⁸³ Feffer Geological Consulting, Inc., *Geotechnical Investigation*, May 18, 2017.

⁸⁴ Los Angeles County Waterworks District, <https://dpw.lacounty.gov/wwd/web/About/SGMA.aspx>, accessed January 2019.

from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, of the related projects would also drain to the surrounding street system or otherwise retain stormwater on-site.

The runoff associated with the related projects would either be directed in non-erosive drainage devices to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. The related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain or the on-site cisterns. Additionally, all of the related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative hydrology, water quality, and flooding impacts during operation would be less than significant.

11. Land Use and Planning

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

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community (a typical example would be a project which involved a continuous right-of-way such as a roadway which would divide a community and impede access between parts of the community).

The Project Site is currently paved, fenced, and vacant. The Project would involve the development of 98 residential apartment units, 68 of which will be reserved for seniors provided in one three-story building and 30 units that will accommodate families provided in several one- and two-story buildings. The Project is located in the Venice community of the City. The Project Site is surrounded on three sides by residential development. To the north and west of the Project Site is a neighborhood referred to as the "Oxford Triangle" which is primarily developed with single family residential uses and zoned R1-1. To the east, the Project Site is adjoined by several multi-story, multi-family residential and mixed-use developments located on sites zoned C4(OX)-2D.

The Project would not cause any permanent street closures, block access to any surrounding land use, or cause any change in the existing street grid system. The Project includes the relocation of an existing vehicular gate on Princeton Drive (northeast of the Project Site) to Thatcher Avenue (northeast corner adjacent to the Project Site). However, there would be no change in the existing development pattern or vehicle circulation of the area. As discussed further in Section 15 (Public Services, Fire Protection), during construction, temporary traffic controls would be provided to direct traffic around any temporary closures. Travel lanes would be maintained in each direction throughout the construction period, and emergency access would not be impeded. All circulation improvements, described in Section 17 (Transportation) of this checklist, that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times. Since the Project would be developed within a long-established urban area, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern. Since the Project would not physically

disrupt or divide the surrounding established community, no impact would occur and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

The Project is located in the Venice community of the City. As such, the Project Site is subject to the applicable policies and zoning requirements of several regional and local plans. At the regional/subregional level, development within the Project Site is subject to the SCAG RCP, SCAG's RTP/SCS, the SCAQMD AQMP, and the Los Angeles County Metropolitan Transportation Authority's (Metro) Congestion Management Program for Los Angeles County (CMP). At the City level, development within the Project Site is subject to the General Plan, the Community Plan, and the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (Planning and Zoning Code). An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to this environmental impact analysis.

SCAG Plans

The goals and policies in the SCAG plans only address projects considered to be regionally significant. SCAG reviews projects and plans throughout its jurisdiction to monitor regional development. In the Southern California region, SCAG acts as the region's "clearinghouse" and collects information on projects of varying size and scope to provide a central point to monitor regional activity. The Project is not considered to be a regionally significant project. As such, the Project is not required to demonstrate consistency with SCAG policies contained in the RCP, RTP/SCS, or Compass Blueprint Growth Vision Report. However, the Project's consistency with the RTP/SCS Final EIR and SCAG MMRP is provided in Section IV of this SCEA.

South Coast Air Quality Management District

The Project Site is located within the Basin and is, therefore, within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of AQMPs. The most recent AQMP was adopted on March 3, 2017 by the Governing Board of the SCAQMD. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP

identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. Control measures established in previous AQMPs have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Air quality impacts of the Project and consistency of the Project with the AQMP are analyzed in greater detail under Question 3.a).

County of Los Angeles

Congestion Management Program

Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The CMP for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the CMP. Metro is the designated congestion management agency responsible for coordinating the County's adopted CMP. The Project's traffic analysis, which is presented in greater detail under Question 17.a), was prepared in accordance with the County of Los Angeles CMP and City Department of Transportation (LADOT) guidelines.

City of Los Angeles

City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan, which designates the Project Site as Public Facilities. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the General Plan consists of the General Plan Framework Element, which addresses citywide policies, and also includes the 35 community plans that guide land use at a local level.

City of Los Angeles General Plan Framework Element

The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in Table V-10, Project Consistency with the Framework Element. Applicable objectives and policies for residential development begin with Objective 3.1. As shown, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

**Table V-10
Project Consistency with the Framework Element**

Objective/Policy ^a	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The Project would develop senior and family housing units in an area surrounded by other residential units and within walking distance of commercial uses along Lincoln Boulevard, which would contribute to the diversity of land uses in the area, which currently includes residential, commercial, retail, and restaurant land uses.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long- Range Land Use Diagram.	Consistent. As discussed under subheading <i>Impacts to Project-Serving Utilities</i> , below, the agencies that provide public infrastructure services and utilities to the Project Site would have capacity to serve the Project.
Policy 3.1.7: Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted. In accordance with Policy 3.1.6, consider amending these plans when new transit routes and stations are confirmed and funding is secured.	Consistent. The Project Site is located within the Venice Coastal Land Use Plan, Venice Coastal Zone Specific Plan, the Oxford Triangle Specific Plan, and the Los Angeles Coastal Transportation Corridor Specific Plan (LACTC). As discussed further in this document and in the Project findings, the Project would not conflict with the applicable Specific Plans.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	Consistent. The Project proposes infill development within an existing urbanized setting with a diversity of land uses, and is within an area well-served by existing transit routes, including service by Big Blue Bus, LADOT Commuter Express, Metro, and Culver City Bus. The Project would also provide bicycle parking spaces so as to reduce car dependency for trips, which helps contribute to greater quality of life and air quality.
Policy 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.	Consistent: The Project would develop 98 multi-family affordable and supportive senior and family residential units, on a site that is surrounded on three sides by residential development. The Project would contribute to the diversity of land uses in the area, which currently includes commercial, residential, retail, and restaurant land uses within walking distance of the Project Site.
Policy 3.2.3: Provide for the development of land use patterns that	Consistent. The Project would provide 42 long-term bicycle parking spaces and 10 short-term

**Table V-10
Project Consistency with the Framework Element**

Objective/Policy^a	Project Consistency
emphasize pedestrian/bicycle access and use in appropriate locations.	bicycle parking spaces. All long-term spaces will be housed in an enclosed bike room in the garage, where residents can secure their bikes. Short term spaces will be provided at grade along the perimeter of the project for visitors or temporary storage. The Project will also provide 20 additional bike parking spaces, permitting a reduction in the required parking (5 vehicle parking spaces). The additional 20 spaces will may be allocated as long-term or short-term spaces at the discretion of the Applicant.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City’s stable residential neighborhoods and enhance the character of commercial and industrial districts.	Consistent. The Project has been designed to fit in with the existing residential communities that surround the Project Site. Specifically, the 98 residential units are spaced across the site in two primary types: a three-story building housing the 68 units for seniors (the “Senior Building”) and various two-story buildings containing larger units for families (the “Family Units”). The Family Units fronting Oxford Avenue have been intentionally designed to mirror the character, mass and scale of the adjacent single-family residential neighborhood of the Oxford Triangle to the west. Patios and entrances for the Family Units are all oriented in towards the central courtyard to provide “eyes” on the common areas within the Project and to protect the privacy of the existing single-family homes to the west. The Project would enhance the character of the existing area by redeveloping a vacant site with high quality, engaging architectural design within an urban area of the City.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City’s neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	Consistent. The Project would provide new affordable and supportive multi-family housing units in a residential area well-served by transit, and within walking distance of commercial uses, particularly along Lincoln Boulevard.
Policy 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	Consistent. The Project would develop a multi-family residential project in an area developed with single- and multi-family residential uses on three sides. Redevelopment of the currently vacant site with residential uses would help to

**Table V-10
Project Consistency with the Framework Element**

Objective/Policy^a	Project Consistency
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.	conserve the existing residential neighborhoods in the immediate area.
Housing Chapter	
Objective 4.1: Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.	Consistent. The Project would develop 98 residential units (one-, two-, and three-bedroom units), all affordable with supportive services for seniors and families with risk of homelessness. This would create additional housing stock and would create 98 new housing opportunities for low-income families in an area underserved by affordable housing.
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs.	Consistent. The Project would develop 98 residential units (one-, two-, and three-bedroom units), all affordable with supportive services for seniors and families with risk of homelessness in a designated Transit Priority Area, within an existing residential neighborhood. The development of housing units would add housing stock to the City would create housing opportunities for low-income families.
Policy 4.1.2: Minimize the overconcentration of very low- and low-income housing developments in City subregions by providing incentives for scattered site development citywide.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness in the Venice neighborhood of the City. The Project Site was one of many Affordable Housing Opportunity Sites (the "AHOS") chosen by the City of Los Angeles to be redeveloped into affordable and supportive housing through a Request for Qualifications/Proposals (RFP) issued in 2016 by the Office of City Administrative Officer. Additionally, pursuant to California Government Code Section 65590 (4) (d) (Mello Act), "New housing developments constructed within the coastal zone shall, where feasible, provide housing units for persons and families of low or moderate income, as defined in Section 50093 of the Health and Safety Code . . . In order to assist in providing new housing units, each local government shall offer density bonuses or other

**Table V-10
Project Consistency with the Framework Element**

Objective/Policy^a	Project Consistency
	incentives, including, but not limited to, modification of zoning and subdivision requirements, accelerated processing of required applications, and the waiver of appropriate fees.” The Project would not over-concentrate affordable housing in the area.
Policy 4.1.3: Minimize the over concentration of public housing projects in a City subregion.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness in the Venice neighborhood of the City. The Venice area has higher than average housing costs and is underserved by affordable housing. Thus, the Project would not over-concentrate affordable housing in the area. The Project, built by a private entity, would not be considered a public housing project.
Policy 4.1.4: Reduce overcrowded housing conditions by providing incentives to encourage development of family-size units.	Consistent. The Project would develop 98 residential units (one-, two-, and three-bedroom units), including 68 senior housing units and 30 family housing units.
Policy 4.1.5: Monitor the growth of housing developments and the forecast of housing needs to achieve a distribution of housing resources to all portions of the City and all income segments of the City's residents.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness in the Venice neighborhood of the City. The Venice area has higher than average housing costs and is underserved by affordable housing.
Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness in the Venice neighborhood of the City.
Policy 4.1.7: Establish incentives for the development of housing units appropriate for families with children and larger families.	Consistent. The Project would develop 98 residential units, including 68 senior housing units and 30 family housing units.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	Consistent. The Project would provide 98 new affordable and supportive multi-family housing units in a residential area well-served by transit, and within walking distance of commercial uses, particularly along Lincoln Boulevard. The Project provides a variety of architectural materials and building planes while employing a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to

**Table V-10
Project Consistency with the Framework Element**

Objective/Policy ^a	Project Consistency
	the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Objective 4.3: Conserve scale and character of residential neighborhoods.	Consistent. The Project provides a variety of architectural materials and building planes while employing a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Urban Form and Neighborhood Design Chapter	
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	Consistent: The Project would redevelop vacant site with a new high quality, affordable and supportive multi-family housing for families and seniors in a community lacking affordable housing. The Project has been designed to be sensitive to and compatible with the existing residential neighborhoods surrounding the site by incorporating a variety of building types and heights. The Project would be constructed to the latest resource-efficient requirements of the LA Green Building Code, and would include on-site bicycle parking and proximity to transit, thereby improving the quality of life and aesthetic quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent: The Project, as an existing regulatory compliance measure, would implement principles of the City's <i>Crime Prevention through Environmental Design Guidelines</i> subject to the approval of the City of Los Angeles Police Department prior to issuance of building permits. Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and, where possible, security controlled to limit public access. Replacing the vacant, fenced off lot with an activated use will improve the safety of the neighborhood.
Objective 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure	Consistent: See consistency analysis for Objective 5.9.

Table V-10
Project Consistency with the Framework Element

Objective/Policy ^a	Project Consistency
storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	
^a City of Los Angeles, <i>The Citywide General Plan Framework Element</i> , readopted August 2001. Source (table): <i>EcoTierra Consulting</i> , February 2019.	

Venice Community Plan and Venice Land Use Plan

The community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. This current Community Plan, adopted in 2000, sets forth planning goals and objectives to maintain the community's distinctive character. The Venice Land Use Plan (LUP), adopted in 2001, further supplements and updates the Community Plan with policies for the Venice Coastal Zone. The Coastal Commission certified the LUP in 2001.

As set forth in the Community Plan and LUP, the Project Site is designated for Public Facilities.⁸⁵ The Community Plan cites a footnote with Public Facilities zones stating, "General Plan Footnote 8: The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zone(s) most consistent within 500 feet of the property boundary and still be considered consistent with the adopted plan."

This footnote is applicable to the Property as the City has identified the site as a surplus property that may be utilized for private purposes. Applicant was chosen to partner with the City for this Project pursuant to a Request for Qualifications/Proposals for the Affordable Housing Opportunity sites issued by the City in 2016. However, the Project does not involve a change of zone or sale of land at this time. All development on the Property will be accomplished through a Public-Private Joint Development and Agreement by the City and the Applicant.

⁸⁵ City of Los Angeles, *General Plan Land Use Map, Venice Community Plan as of September 29, 2000*, website: <https://planning.lacity.org/complan/westla/PDF/venplanmap.pdf>, accessed: February 2019.

The Project Site is surrounded on three sides by residential development. To the north and west of the Project Site is a neighborhood referred to as the “Oxford Triangle” which is primarily developed with single family residential uses and are designated for Low Residential by the Community Plan. To east, the Property is adjoined by several multi-story, multi-family residential and mixed-use developments located on sites designated Community Commercial.

The Project’s consistency with the applicable objectives and policies of the Community Plan is presented in Table V-11, Project Consistency with the Venice Community Plan. As shown, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Table V-11
Project Consistency with the Venice Community Plan

Objective/Policy ^a	Project Consistency
Objective 1-1: To provide for the preservation of the housing stock and its expansion to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area to the year 2010.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness. This would create additional housing stock and would create 98 new housing opportunities for low-income families in an area underserved by affordable housing.
Policy 1-1.2: Protect the quality of the residential environment and the appearance of communities with attention to site and building design.	Consistent. The Project has been designed to be sensitive to and compatible with the existing residential neighborhoods surrounding the site. The Project provides a variety of architectural materials and building planes while employing a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Policy 1-1.3: Protect existing single-family residential neighborhoods from new out-of-scale development and other incompatible uses.	Consistent. The Project has been designed to be sensitive to and compatible with the existing residential neighborhoods surrounding the site. The Project provides a variety of architectural materials and building planes while employing a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to services and facilities.	Consistent. The Project proposes 98 new affordable housing units within an existing urbanized setting with a diversity of land uses, within an area well-served by existing transit routes, including service by Big Blue Bus, LADOT Commuter Express, Metro, and Culver City Bus. The Project is within walking distance

**Table V-11
Project Consistency with the Venice Community Plan**

Objective/Policy ^a	Project Consistency
	of retail businesses and commercial land uses, particularly along Lincoln Boulevard.
Policy 1-2.1: Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	Consistent. The Project would provide 98 new affordable housing units within an existing urbanized setting with a diversity of land uses, within an area well-served by existing transit routes, including service by Big Blue Bus, LADOT Commuter Express, Metro, and Culver City Bus. The Project would provide opportunities for residents, employees, and visitors to use public transit, and walk to other retail businesses and commercial land uses near the Project Site.
Policy 1-2.2: Encourage multiple-family residential development in commercial zones.	Consistent. The Project would provide 98 residential units on a site that is currently zoned [Q]PF-1XL. The site is not zoned for commercial uses, but is adjacent to commercial zoning across Thatcher Avenue to the east.
Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	Consistent. The Project has been designed to be sensitive to and compatible with the existing residential neighborhoods surrounding the site, with transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north.
Policy 1-3.1: Seek a higher degree of architectural compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	Consistent. The Project buildings include a variety of architectural materials and building planes with a façade that intentionally transitions in scale to blend the massing of the larger mixed-use and multi-family buildings along Lincoln Boulevard to the east, with the smaller scale single-family homes of Oxford Triangle to the west and north. As the Project abuts a public street on three of the four frontages, the architecture has been articulated throughout every building face with a change of material.
Policy 1-3.2: Proposals to alter planned residential density should consider factors of neighborhood character and identity, compatibility of land uses, impact on livability, adequacy of public services and facilities, and impacts on traffic levels.	Consistent. The Project would provide 98 new affordable and supportive multi-family housing units in a residential area well-served by transit, and within walking distance of commercial uses, particularly along Lincoln Boulevard. The Project would not alter planned residential density.
Objective 1-4: To promote the adequacy and affordability of multiple-family housing	Consistent. The Project would develop 98 residential units, all of which would be

**Table V-11
Project Consistency with the Venice Community Plan**

Objective/Policy ^a	Project Consistency
and increase its accessibility to more segments of the population.	affordable units. The Project includes supportive services for seniors and families with risk of homelessness.
Policy 1-4.1: Promote greater individual choice in type, quality, price and location of housing.	Consistent. The Project would develop 98 residential units, all affordable with supportive services for seniors and families with risk of homelessness in the Venice neighborhood of the City, which currently lacks affordable housing.
Policy 1-4.2: Ensure that new housing opportunities minimize displacement of residents.	Consistent. The Project would develop 98 new affordable residential units on a lot that is currently vacant and would not displace any residents.
^a City of Los Angeles Department of City Planning, Venice Community Plan, adopted September 29, 2000. Source (table): EcoTierra Consulting, February 2019.	

Venice Coastal Zone Specific Plan

The Project Site is located within the Venice Coastal Zone Specific Plan (VCZSP). The VCZSP became effective on January 19, 2004, governing portions of Venice that are located within the Coastal Zone. The VCZSP designates the Property as [Q]PF-1XL with Public Facility Land Uses, per the underlying zoning and land use designation, within the Oxford Triangle Subarea. The following Development Standards of the VCZSP are applicable to the Project, and the Project's compliance with those standards is discussed below.

Section 9

B. HEIGHT. Height shall be measured as the vertical distance from ground level, as specified below for each subarea, to the highest point of the roof or parapet wall, excluding roof deck railings that do not exceed 36 inches and are of an open design, unless specified otherwise in this Section.

1. For the Lagoon Lots in the Silver Strand and Ballona Lagoon West Bank Subareas, height shall be measured from the average existing natural grade.

2. For lots in the Venice Canals Subarea, height shall be measured from the elevation of the centerline of the adjacent alleyway measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building.

3. For all other lots, height shall be measured from the centerline of the street or alley or walk adjacent to the front lot line measured from the projection of the midpoint of the lot frontage, except where more than one building is being constructed on that lot, height for each building shall be measured from the projection of the midpoint of each building. For through lots, height shall be measured from the centerline of whichever adjacent street is

the lowest in elevation. In any case involving a Grand Canal Lot, height shall be measured from the elevation of the Grand Canal Esplanade sidewalk.

The Project complies with Section 9-B.3; the height of each building is measured from the centerline of the lot frontage along Princeton Drive. According to a survey completed by a civil engineer, the elevation at this point is 10.03 feet. The highest measurable point within the Project occurs at the community building tower, at which point the elevation measures 50.5 feet. The maximum height of Project, measured from the centerline of the midpoint of Princeton Drive to the highest point of the Project is 40.5 feet. The Project complies with this requirement.

Section 10. LAND USE AND DEVELOPMENT REGULATIONS FOR SUBAREAS

In addition to the regulations in Section 9, the following regulations shall apply within each of the specified subareas in Sub-sections A-H below.

F. OXFORD TRIANGLE

1. Density. Commercial Zones. No residential Venice Coastal Development Project shall exceed a density that is allowed in the R3 zone, except as permitted by the Oxford Triangle Specific Plan.

The Project is not located in a Commercial Zone, therefore this provision does not apply. The underlying zone, [Q]PF-1XL, does not inherently have a prescribed density allowance or limitation. Pursuant to the requested Conditional Use Permit, the Project density has been designed to be compatible with the adjacent uses and zones. Per an R3 density calculation of 1 dwelling units for every 800 square feet of lot area, the site would permit a total of 116.5 or 117 units. In an effort to maintain compatibility with the neighborhood, the Project proposes a total density of 98 units. This density maximum is achievable through the Conditional Use Request for uses more intense than those permitted in the nearest adjoining zone (R1-1).

2. Height.

a. R-1 Residential Zone. Venice Coastal Development Projects with a Flat Roof Shall not exceed a maximum height of 25 feet; Venice Coastal Development Projects with a Varied Roofline shall not exceed a maximum height of 30 feet.

b. C2 Commercial Zone. Venice Coastal Development Projects shall not exceed a maximum height of 30 feet on all C2 zoned lots.

Property is specified with in the Oxford Triangle Area that regulates Maximum Building Height for all lots within the Exhibit 13 “Height – Subarea: Oxford Triangle” boundaries. While the Project is not located in the R1-1 or C2 commercial zone, this map indicates that the Project is subject to the height limitations. As a Residential project, the Project will observe a base height of 30 feet with a Varied Roofline, consistent with the intent of the Specific Plan. The Project is subject to the 30-foot height limitation of the 1XL Height District (LAMC Section 12..21.1-A). The Project is requesting an increase in height, permitted through an “on-menu” incentive in accordance with SB1818 Density Bonus, which would provide an additional 10.5 feet in allowable height, for a total

height of 40.5 feet necessary to accommodate the provision of affordable housing units. The Project complies with this requirement with a maximum height of 40.5 feet. All height measurements are taken from the elevation of the fronting right-of-way (Princeton Drive), as dictated by Section 9B of the VCZSP. The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Section 13 PARKING D. PARKING REQUIREMENTS TABLE

Multiple dwelling and duplex on a lot of 40 feet or more in width – Two spaces for each dwelling unit; plus a minimum of one guest parking space for each four or fewer units (e.g., 0.25 guest parking space per unit, any fraction shall be rounded up to require one additional guest parking space).

The Project is subject to the provisions of the Density Bonus Ordinance (LAMC Section 12.22-A.25), which supersedes the parking provisions of the Specific Plan. The Project will utilize Density Bonus Parking Option 1 and the provisions of LAMC for Senior Independent Housing units.

Oxford Triangle Specific Plan

The Property is located within the Oxford Triangle Specific Plan (OTSP). The OTSP became effective on July 31, 1987 and was subsequently corrected by ORD 170,155, effective January 14, 1995. The OTSP governs the area bounded by Washington Boulevard to the north, Admiralty Way to the south, and Lincoln Boulevard to the west. The OTSP established a zoning designation of R1-1 for the Property. The main purpose and intent of the OTSP is to regulate development within the Community Commercial designated areas of the Oxford Triangle Subarea and outlines development regulations for the C4(OX)-2-D zone.

After the adoption and subsequent correction of the OTSP, the Property was rezoned from R1-1 to [Q]PF-1-XL by ORD 170,999, effective May 22, 1996. This zone change established the current zoning designation for the Property. The “Q” Condition in the zoning designation for the Property provides that the “subject property shall be subject to all conditions imposed under the City Plan Case No. 2836.” Those conditions require trees plantings on the southwesterly perimeter to screen the City’s maintenance yard activities from the residential properties located across Oxford Street. These conditions will not apply to the Project, since it is not a City maintenance yard.

The development standards in the OTSP regulations relate solely to commercially zoned property and therefore do not apply to the Project. As such, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Los Angeles Coastal Transportation Corridor Specific Plan

The Los Angeles Coastal Transportation Corridor Specific Plan (LACTC) provides an outline for development within the Specific Plan Area to encourage alternate modes of transportation (i.e., bicycle, mass transit, etc.) and to mitigate the impact of new commercial and industrial

development within the corridor and coastal area. Under the LACTC, a Project is defined as any construction, addition, conversion, change of use, or use of land on a lot in the C, M, or P Zones, which requires the issuance of a building, grading or foundation permit, and which results in an increase in the number of vehicle trips as determined by the Department of Transportation. The Project does not include the development of commercial or industrial development in the C, M, or P zones, therefore does not qualify as a project under the LACTC.

Los Angeles Municipal Code – Zoning Code

All on-site development activity is subject to the City's Planning and Zoning Code. The LAMC establishes the zoning for the Project Site as [Q]PF-1XL (Public Facilities – 1XL Height District) where the Q-Condition states "the subject property shall be subject to all conditions imposed under City Plan Case No. 2836". City Plan Case No. 2836 was related to use of the Project Site by the Bureau of Sanitation and as the Bureau of Sanitation use has been discontinued and the Property will be developed with residential uses in perpetuity, the Q-Condition is not applicable to the redevelopment of the Property.

The Project Site was previously developed and operated as a maintenance yard for the City of Los Angeles Bureau of Sanitation. All buildings and on-site structures were demolished in 2016. The Property has remained vacant since 2016. The Property is surrounded on three sides by residential development. To the north and west of the Property is a neighborhood referred to as the "Oxford Triangle" which is primarily developed with single family residential uses and zones R1-1. To east, the Property is adjoined by several multi-story, multi-family residential and mixed-use developments located on sites zoned C4(OX)-2D.

The Community Plan cites a footnote with Public Facilities zones stating, "General Plan Footnote 8: The Public Facility (PF) planning land use designation is premised on the ownership and use of the property by a government agency. The designation of the PF Zone as a corresponding zone is based on the same premise. The Plan also intends that when a board or governing body of a government agency officially determines that a property zoned PF is surplus, and no other public agency has indicated an intent to acquire, and the City is notified that the agency intends to offer the property for sale to a private purchaser, then the property may be rezoned to the zone(s) most consistent within 500 feet of the property boundary and still be considered consistent with the adopted plan."

This footnote is applicable to the Property as the City has identified the site as a surplus property that may be utilized for private purposes. Applicant was chosen to partner with the City for this Project pursuant to a Request for Qualifications/Proposals for the Affordable Housing Opportunity sites issued by the City in 2016. However, the Project does not involve a change of zone or sale of land at this time. All development on the Property will be accomplished through a Public-Private Joint Development and Agreement by the City and the Applicant.

As part of the Project, the Applicant requests a Conditional Use Permit, pursuant to LAMC Section 12.24 U.21, to permit any joint public and private development uses more intensive than those permitted in the most restrictive adjoining zones. The phrase "adjoining zones" refers to the zones

of properties abutting, across the street or alley from, or having a common corner with, the Project Site.

The proposed development includes 98 residential units in the [Q]PF-1XL zone. The most restrictive adjoining zone, located across Oxford Avenue to the west of the property, is classified as R1-1 by the underlying zoning and the OTSP. To the east of the Project, the C4(OX)-2D zone permits the development of multi-family uses with increased density, FAR, and height in accordance with the standards of the R3 zone, per the provisions of the OTSP.

While the underlying zoning on the Project Site classifies the property within the PF zone, the OTSP and the VCZSP do not put forth explicit standards for residential development on a site designated for Public Facilities. As such, the Project proposes a blend of development standards including density, FAR, setbacks. In most instances, these area standards are significantly less than the allowances which would be permitted in the adjacent C4(OX)-2D zone.

The C4 “Commercial” zone allows any use permitted in the “C2” “Commercial” zone. A generalized summary of land uses allowed in the C2 zone include the following:

- Retail uses with limited manufacturing;
- Office or businesses;
- Hotels, hospitals, and/or clinics;
- Broadcasting studios;
- Parking buildings;
- Service stations and garages;
- Churches, schools, and child care;
- Apartment houses, multiple dwellings; and
- Two-family dwellings.⁸⁶
- Skilled Nursing Care Housing. (Added by Ord. No. 178,063, Eff. 12/30/06.)
- Alzheimer's/Dementia Care Housing. (Added by Ord. No. 178,063, Eff. 12/30/06.)

Therefore, the multi-family residential use of the Project is consistent with the C4 zoning of the nearby adjacent zone.

The Project is requesting an On-Menu request per LAMC 12.22-A.25(f)(5) for a percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. The project requests a 35 percent increase in height for a total height of 40.5 feet, in lieu of the otherwise permitted 30-foot height limit per the VCZSP.

Through the utilization of Density Bonus Parking Option 1 and the provisions of LAMC for Senior Independent Housing units, the Project requires 36 vehicular parking spaces for the 68 units in the Senior Building and 48 vehicular parking spaces are required based on the bedrooms quantities of the Family Units, for a total of 84 required spaces, per LAMC 12.21-A.4(u). Additionally, the total required parking may be reduced by five more spaces with the provision of 16 additional bike parking spaces, for a total requirement of 79 spaces. The Project will exceed

⁸⁶ Summarized from LAMC Section 12.14.

this requirement by providing 82 vehicular spaces within the semi-subterranean garage. Five of the 82 parking spaces would include electric vehicle (EV) chargers.

Per the Bicycle Parking Ordinance (ORD 185,480), the Project is required to provide 42 long-term and 10 short-term bicycle parking spaces. The Project will exceed code-required bicycle parking requirements, by providing 42 long-term spaces and 10 short-term spaces, along with 20 additional bicycle parking spaces, permitting a reduction in the required parking (5 vehicle parking spaces), for a total of 72 bicycle parking spaces. All long-term spaces will be housed in an enclosed bike room in the garage, where residents can secure their bikes. Short term spaces will be provided at grade along the perimeter of the project for visitors or temporary storage. The Project will also provide 16 additional bike parking spaces, permitting a reduction in the required parking (4 vehicle parking spaces).

The Project would require 10,800 square feet of open space pursuant to the LAMC based on the total number of units. The Project includes approximately 19,950 square feet of open space and residential amenities would be located in several distinct areas. Of the required open space (10,800 square feet), 2,700 square feet is required to be landscaped;⁸⁷ 8,111 square feet of the proposed open space would be landscaped. The Project would also provide 4,700 square feet of private open space as balconies on 94 of the residential units.

Based on the above, the Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Los Angeles Green Building Code

The Los Angeles Green Building Code (“LA Green Building Code”) is based on the California Green Building Standards Code (commonly known as CALGreen), 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 LA Green Building Code:

- All new buildings (residential and non-residential);
- Every building alteration with a building permit valuation of \$200,000 or more (residential and non-residential);
- Residential alterations that increase the building’s conditioned volume; and
- Every building addition (residential and non-residential)

The Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements, and would target to achieve LEED or equivalent certification or GreenPoint rating. The Project would include, but not be limited to, the following features:

⁸⁷ 25% of required common open space is required to be landscaped. 25% of 10,800 square feet is 2,700 square feet.

- Five (5) percent of parking spaces will have chargers for electric vehicles;
- Air tight and insulated envelope;
- Low-E windows;
- Low-water use plumbing fixtures;
- Energy Star appliances;
- LED lighting with motion sensors; and
- Low-water use landscaping and weather-sensor controlled drip irrigation.

The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the land use and planning analysis above. The cumulative impacts study area for land use and planning is the extent of the related projects and the Community Plan Area.

With respect to community division, it is unknown whether or not any of the related projects or other development in the Community Plan Area would divide an existing community. However, as the Project would have no impact with respect to community division and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, it would not contribute to a cumulative impact.

Development of the related projects is expected to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

12. Mineral Resources

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

a) 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. A significant impact may occur if a project is located in an area used or available for extraction of a regionally important mineral resource and the project converted an existing or potential future regionally important mineral extraction use to another reuse or if the project affected access to a site used or was potentially available for regionally important mineral resource extraction.

The Project Site is fully developed and no oil wells are present.⁸⁸ Additionally, the Site is not located within the boundaries of a major oil drilling area or within a State-designated oil field.⁸⁹ Furthermore, the Project Site is not located within an MRZ-2 zone.⁹⁰ The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Therefore, no impact would occur, and no mitigation measures are required.

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

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally important mineral resource extraction and the project converted an existing or potential future locally-important mineral extraction use to another use or if the project affected access to a site used or potentially available for locally-important mineral resource extraction.

As discussed above under responses to Checklist Question 12(a), the Project Site is not within a major drilling area or State-designated oil field, or within an MRZ-2 zone. The Project would not

⁸⁸ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: April 2019.

⁸⁹ City of Los Angeles Department of City Planning, *Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996*.

⁹⁰ City of Los Angeles Department of City Planning, *Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, adopted September 2001*.

affect any extraction activities and there would be no impact on existing or future regionally important mineral extraction sites. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, no impact would occur, and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the mineral resources analysis above, including loss of availability of a known mineral resource or locally important mineral resource recovery site. The cumulative impacts study area for mineral resources is the extent of the related projects.

It is unknown whether or not any of the related project sites contain mineral resources. However, as the Project would have no impact on mineral resources, it would not contribute to a cumulative impact. Therefore, there would be no cumulative impact on mineral resources and no mitigation measures are required.

13. Noise

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

The following noise impact analysis summarizes and incorporates by reference the information provided in the *Thatcher Yard Residential Noise Impact Analysis* prepared by Urban Crossroads in March 2019 (the "Noise Report"). The Noise Report is available as Appendix G to this document.

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

Less Than Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). (See Section 41.40 and Sections 111.00 through 116.01 of the LAMC.) Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Regulatory Setting

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the federal government, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. In most areas, automobile and truck traffic is the major source of environmental noise. Traffic activity generally produces an average sound level that remains constant with time. Air and rail traffic,

and commercial and industrial activities are also major sources of noise in some areas. Federal, state, and local agencies regulate different aspects of environmental noise. Federal and state agencies generally set noise standards for mobile sources such as aircraft and motor vehicles, while regulation of stationary sources is left to local agencies.

State of California Noise Requirements

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards and provides guidance for local land use compatibility. State law requires that each county and city adopt a General Plan that includes a Noise Element which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. In addition, CEQA requires that all known environmental effects of a project be analyzed, including the potential environmental noise impacts.

State of California Building Code

The State of California's noise insulation standards are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 2, and the California Building Code. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are developed near major transportation noise sources, and where such noise sources create an exterior noise level of 60 dBA CNEL or higher. Acoustical studies that accompany building plans for noise-sensitive land uses must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

City of Los Angeles General Plan Noise Element

The City of Los Angeles has adopted a Noise Element of the General Plan to identify goals, objectives, and policies for managing noise issues within the City. The following goal and objectives are identified in the General Plan Noise Element:

- | | |
|--------------------|---|
| Goal | A city where noise does not reduce the quality of urban life. |
| <i>Objective 1</i> | Reduce airport and harbor related noise impacts. |
| <i>Objective 2</i> | Reduce or eliminate nonairport related intrusive noise, especially relative to noise sensitive uses. |
| <i>Objective 3</i> | Reduce or eliminate noise impacts associated with proposed development of land and changes in land use. |

Exhibit I of the City of Los Angeles General Plan Noise Element identifies Guidelines for Noise Compatible Land Use to evaluate the potential impacts of transportation-related noise. Multi-family residential land use, such as the Project, is considered conditionally acceptable with

unmitigated exterior noise levels of less than 65 dBA CNEL. For conditionally acceptable exterior noise levels, new construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

City of Los Angeles Operational Noise Standards

To analyze noise impacts originating from a designated fixed location or private property such as the Project, stationary-source (operational) noise such as the expected mechanical ventilation equipment, trash enclosure activity, a pad-mounted transformer, and playground/park activity are typically evaluated against standards established under a jurisdiction's Municipal Code or General Plan.

Chapter XI of the LAMC establishes Noise Regulations, setting exterior noise limits to control community noise impacts from residential noise sources including air conditioning units, refrigeration, heating, pumping, and filtering equipment. Section 112.02 indicates that such equipment shall not operate in a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA.

City of Los Angeles Construction Noise Standards

Section 112.05 of the City's Municipal Code identifies exterior noise level limits for construction equipment in any residential zone or within 500 feet thereof, as follows:

- 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment.

However, the above limitation does not apply where technically infeasible (i.e. the noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers, and/or any other feasible noise reduction measures). For the purpose of this SCEA, the LAMC 75 dBA Leq threshold is used to determine potential Project-related construction noise level impacts at nearby sensitive receiver locations.

Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

Off-Site Operational Traffic Noise

- When the noise levels at existing and future noise-sensitive land uses (e.g. residential, etc.):

- are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- already exceed 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL (FICON, 1992).

On-Site Transportation Noise

- If the on-site exterior noise levels exceed the conditionally acceptable 65 dBA CNEL and the interior noise levels exceed 45 dBA CNEL at the residential uses located within the Project site (City of Los Angeles General Plan Noise Element and Building Code, Section 91.1207.11.2).

Operational Stationary-Source Noise

- If Project-related operational (stationary source) noise levels exceed the exterior ambient noise levels at adjacent sensitive receiver locations by 5 dBA Leq (LAMC § 112.02).

Construction Noise and Vibration

- If Project-related construction activities generate noise levels which exceed the exterior noise level standard of 75 dBA Leq at adjacent sensitive receiver locations (LAMC §112.05), unless technically infeasible.
- If short-term Project generated construction vibration levels exceed California Department of Transportation (Caltrans) building damage vibration standard of 0.3 in/sec PPV at sensitive receiver locations (Caltrans Transportation and Construction Vibration Guidance Manual, Table 19).

Existing Noise Level Measurements

To assess the existing noise level environment, six 24-hour noise level measurements were taken at sensitive receiver locations in the Project study area. The receiver locations were selected to describe and document the existing noise environment within the Project study area. Exhibit 5-A of the Noise Report provides the boundaries of the Project study area and the noise level measurement locations. To fully describe the existing noise conditions, noise level measurements were collected by Urban Crossroads, Inc. on Tuesday, January 8th, 2019.

Measurement Procedure and Criteria

To describe the existing noise environment, the hourly noise levels were measured during typical weekday conditions over a 24-hour period. By collecting individual hourly noise level measurements, it is possible to describe the daytime and nighttime hourly noise levels and calculate the 24-hour CNEL. The long-term noise readings were recorded using Piccolo Type 2 integrating sound level meter and data loggers. The Piccolo sound level meters were calibrated using a Larson-Davis calibrator, Model CAL 150. All noise meters were programmed in “slow”

mode to record noise levels in “A” weighted form. The sound level meters and microphones were equipped with a windscreen during all measurements. All noise level measurement equipment satisfies the American National Standards Institute (ANSI) standard specifications for sound level meters ANSI S1.4-2014/IEC 61672-1:2013.

Noise Measurement Locations

The long-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient hourly noise levels surrounding the Project site. Both Caltrans and the Federal Transit Administration (FTA) recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, *sites must be free of noise contamination by sources other than sources of interest. Avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources.* Further, FTA guidance states, *that it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.*

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before and after Project noise levels and is necessary to assess potential noise impacts due to the Project’s contribution to the ambient noise levels.

Noise Measurement Results

The noise measurements presented below focus on the average or equivalent sound levels (Leq). The equivalent sound level (Leq) represents a steady state sound level containing the same total energy as a time varying signal over a given sample period. Table V-12 identifies the hourly daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) noise levels at each noise level measurement location. The Noise Report (see Appendix G) provides a summary of the existing hourly ambient noise levels described below:

- Location L1 represents the noise levels on Princeton Drive near the northern boundary of the Project site and existing single-family residential homes. The noise level measurements collected show an overall 24-hour exterior noise level of 59.9 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 56.7 dBA Leq with an average nighttime noise level of 52.3 dBA Leq.

- Location L2 represents the noise levels on Thatcher Avenue near the eastern boundary of the Project site and Mirabella Apartment Homes. The noise level measurements collected show an overall 24-hour exterior noise level of 58.1 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 56.2 dBA Leq with an average nighttime noise level of 49.6 dBA Leq.
- Location L3 represents the noise levels on Thatcher Avenue near the eastern boundary of the Project site and Mirabella Apartment Homes. The 24-hour CNEL indicates that the overall exterior noise level is 58.0 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 56.3 dBA Leq with an average nighttime noise level of 49.3 dBA Leq.
- Location L4 represents the noise levels on Thatcher Avenue near the southern boundary of the Project site and Harbor Crossing Lane. The noise level measurements collected show an overall 24-hour exterior noise level of 59.3 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 57.2 dBA Leq with an average nighttime noise level of 51.0 dBA Leq.
- Location L5 represents the noise levels on Oxford Avenue near the southwestern boundary of the Project site and existing single-family residential homes. The noise level measurements collected show an overall 24-hour exterior noise level of 58.5 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 54.2 dBA Leq with an average nighttime noise level of 51.3 dBA Leq.
- Location L6 represents the noise levels on Oxford Avenue near the western boundary of the Project site and existing single-family residential homes. The 24-hour CNEL indicates that the overall exterior noise level is 67.5 dBA CNEL. The energy (logarithmic) average daytime noise level was calculated at 59.3 dBA Leq with an average nighttime noise level of 60.9 dBA Leq.

Table V-12 provides the (energy average) noise levels used to describe the daytime and nighttime ambient conditions. These daytime and nighttime energy average noise levels represent the average of all hourly noise levels observed during these time periods expressed as a single number. Appendix 5.2 of the Noise Report (see Appendix G) provides summary worksheets of the noise levels for each hour as well as the minimum, maximum, L1, L2, L5, L8, L25, L50, L90, L95, and L99 percentile noise levels observed during the daytime and nighttime periods.

The background ambient noise levels in the Project study area are dominated by the transportation-related noise associated with the arterial roadway network. This includes auto and heavy truck activity near the noise level measurement locations. The 24-hour existing noise level measurements shown on Table V-12 present the worst-case existing unmitigated ambient noise conditions.

Table V-12
24-Hour Ambient Noise Level Measurements

Location ¹	Distance to Project Boundary (Feet)	Description	Energy Average Noise Level (dBA Leq) ²		CNEL
			Daytime	Nighttime	

L1	48'	Located on Princeton Drive near the northern boundary of the Project site and existing single-family residential homes.	56.7	52.3	59.9
L2	0'	Located on Thatcher Avenue near the eastern boundary of the Project site and Mirabella Apartment Homes.	56.2	49.6	58.1
L3	0'	Located on Thatcher Avenue near the eastern boundary of the Project site and Mirabella Apartment Homes.	56.3	49.3	58.0
L4	50'	Located on Thatcher Avenue near the southern boundary of the Project site and Harbor Crossing Lane.	57.2	51.0	59.3
L5	50'	Located on Oxford Avenue near the southwestern boundary of the Project site and existing single-family residential homes.	54.2	51.3	58.5
L6	0'	Located on Oxford Avenue near the western boundary of the Project site and existing single-family residential homes.	59.3	60.9	67.5
<p><i>Notes:</i></p> <p>1 See Exhibit 5-A of the Noise Report for the noise level measurement locations.</p> <p>2 The long-term 24-hour measurement printouts are included in Appendix 5.2 of the Noise Report (Appendix G to this document).</p> <p>"Daytime" = 7:00 a.m. to 10:00 p.m.; "Nighttime" = 10:00 p.m. to 7:00 a.m.</p>					

Off-Site Transportation Noise Impacts

To assess the off-site transportation CNEL noise level impacts associated with development of the Project, noise contours were developed based on the Traffic Memo. Noise contour boundaries represent the equal levels of noise exposure and are measured in CNEL from the center of the roadway. Noise contours were developed for the following traffic scenarios:

- Existing Without / With Project Conditions: This scenario refers to the existing present-day noise conditions, without and with the proposed Project.
- Future Without / With Project: This scenario refers to the background future noise conditions without and with the proposed Project, and includes all cumulative projects identified in the Traffic Impact Analysis.

Future Project Traffic Noise Levels

Table V-13 presents a comparison of the Future without and with Project conditions CNEL noise levels and shows that the Project is expected to generate an exterior noise level increase of up to 0.3 dBA CNEL. Therefore, the Project would not exceed the significance thresholds on any roadway segments adjacent to noise-sensitive receiver locations, and the off-site Project-related traffic noise level increases are considered less than significant.

Table V-13
Future Off-Site Project-Related Traffic Noise Impacts

ID	Road	Segment	CNEL at Adjacent Land Use (dBA) ¹			Threshold Exceeded? ²
			No Project	With Project	Project Addition	
1	Lincoln Bl.	n/o W. Washington Bl.	63.8	63.8	0.0	No
2	Lincoln Bl.	s/o W. Washington Bl.	64.8	64.9	0.1	No
3	Lincoln Bl.	n/o Jefferson Wy.	64.9	64.9	0.0	No
4	Lincoln Bl.	s/o Jefferson Wy.	64.9	64.9	0.0	No
5	Lincoln Bl.	n/o Maxella Av.	64.6	64.6	0.0	No
6	Lincoln Bl.	s/o Maxella Av.	65.2	65.2	0.0	No
7	Lincoln Bl.	s/o Marina Expy.	64.1	64.1	0.0	No
8	W. Washington Bl.	w/o Lincoln Bl.	62.2	62.2	0.0	No
9	W. Washington Bl.	e/o Lincoln Bl.	62.2	62.2	0.0	No
10	Jefferson Wy.	w/o Lincoln Bl.	51.4	51.7	0.3	No
11	Maxella Av.	e/o Lincoln Bl.	60.9	60.9	0.0	No
12	Marina Expy.	e/o Lincoln Bl.	64.0	64.0	0.0	No

Notes:
1 The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the nearest adjacent land use.
2 Significance Criteria (Section 4 of the Noise Report).

Receiver Locations

To assess the potential for long-term operational and short-term construction impacts, the following receiver locations (also shown on Exhibit 9-A of the Noise Report) were identified as representative locations for analysis. The City of Los Angeles General Plan Noise Element defines noise-sensitive uses as: *single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.* Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

- R1: Located approximately 69 feet northwest of the Project site, R1 represents existing residential homes on the north side of Princeton Drive. A 24-hour noise level measurement was taken near this location, L1, to describe the existing ambient noise environment.
- R2: Location R2 represents the existing residential apartment building located approximately 73 feet northeast of the Project site on the east side of Thatcher Avenue. A 24-hour noise level measurement was taken near this location, L2, to describe the existing ambient noise environment.
- R3: Location R3 represents the existing residential apartment building located roughly 49 feet from the Project site boundary on the east side of Thatcher Avenue. The first-floor of this building is a parking garage, and as such, only second-floor receiver

locations are analyzed in this noise study at R3. A 24-hour noise level measurement was taken near this location, L3, to describe the existing ambient noise environment.

- R4: Location R4 represents the existing residential apartment building located roughly 41 feet from the Project site boundary on the east side of Thatcher Avenue. The first-floor of this building is a parking garage, and as such, only second-floor receiver locations are analyzed in this noise study at R4. A 24-hour noise level measurement was taken near this location, L4, to describe the existing ambient noise environment.
- R5: Location R5 represents existing residential homes within a gated community located approximately 34 feet south of the Project site on Harbor Crossing Lane. A 24-hour noise level measurement was taken near this location, L4, to describe the existing ambient noise environment.
- R6: Location R6 represents the residential home and outdoor living area (backyard) located roughly 10 feet from the Project site boundary on the cul-de-sac of Oxford Avenue. A 24-hour noise level measurement was taken near this location, L5, to describe the existing ambient noise environment.
- R7: Location R7 represents the existing residential homes located west of the Project site, at roughly 65 feet, on the west side of Oxford Avenue. A 24-hour noise level measurement was taken near this location, L5, to describe the existing ambient noise environment.

Other sensitive land uses in the Project study area that are located at greater distances than those identified in this noise study will experience lower noise levels than those presented in the Noise Report due to the additional attenuation from distance and the shielding of intervening structures.

Construction Impacts

This section analyzes potential impacts resulting from the short-term construction activities associated with the development of the Project.

Construction Noise Levels

Noise generated by the Project construction equipment will include a combination of trucks, power tools, concrete mixers and portable generators that when combined can reach high levels. The number and mix of construction equipment is expected to occur in the following stages:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

The construction noise analysis was prepared using reference noise level measurements taken by Urban Crossroads, Inc. to describe the typical construction activity noise levels for each stage of Project construction. The construction reference noise level measurements represent a list of typical construction activity noise levels. Noise levels generated by heavy construction equipment

can range from approximately 62 dBA to more than 80 dBA when measured at 50 feet. However, these noise levels diminish with distance from the construction site at a rate of 6 dBA per doubling of distance. For example, a noise level of 80 dBA measured at 50 feet from the noise source to the receiver would be reduced to 74 dBA at 100 feet from the source to the receiver, and would be further reduced to 68 dBA at 200 feet from the source to the receiver.

Construction Reference Noise Levels

To describe the Project construction noise levels, measurements were collected for similar activities at several construction sites. Table 11-1 in the Noise Report provides a summary of the reference construction noise level measurements. Since the reference noise levels were collected at varying distances, all construction noise level measurements presented in Table 11-1 of the Noise Report have been adjusted to describe a common reference distance of 50 feet.

Construction Noise Analysis

Based on the reference construction noise levels, the Project-related construction noise levels when the highest reference noise level is operating at a single point nearest the sensitive receiver location will range from 53.6 to 72.9 dBA Leq at the sensitive receiver locations in the City.

Construction Noise Levels of Significance

The construction noise analysis shows that the highest construction noise levels will occur when construction activities take place at the edge of the Project site boundaries. As shown in Table 11-8 of the Noise Report, construction noise levels are expected to range from 53.6 to 72.9 dBA Leq at the sensitive receiver locations in the City. To control noise impacts associated with the construction of the proposed Project, the LAMC has established an exterior noise level standard of 75 dBA Leq. Based on the Project-related construction noise levels approaching 72.9 dBA Leq, the unmitigated noise levels satisfy the LAMC 75 dBA Leq exterior noise level standard for construction. Therefore, Project construction noise levels represent a less than significant noise impact at adjacent sensitive receiver locations, as shown on Table V-14.

**Table V-14
Unmitigated Construction Equipment Noise Level Compliance (DBA Leq)**

Receiver Location¹	Highest Project Construction Noise Level²	Threshold³	Threshold Exceeded?⁴
R1	59.5	75	No
R2	64.0	75	No
R3	66.3	75	No
R4	65.9	75	No
R5	63.0	75	No
R6	72.9	75	No
R7	64.2	75	No

Notes:

1 See Exhibit 11-A of the Noise Report for the sensitive receiver locations.

2 Peak Project construction noise levels as shown on Table 11-8 of the Noise Report.

3 Source: City of Los Angeles Municipal Code, Section 112.05.

4 Do the peak Project construction noise levels exceed the threshold identified by the City of Los Angeles?

Operational Noise Impacts

This section analyzes the potential stationary-source operational noise impacts due to the Project's stationary noise sources on the off-site sensitive receiver locations identified above (Receiver Locations).

Operational Noise Sources

Project-related stationary-source (operational) noise sources are expected to include: mechanical ventilation equipment, trash enclosure activity, a pad-mounted transformer, and playground/park activity. Further, the proposed residential land uses are considered noise-sensitive receiving land uses and are not expected to include any specific type of operational noise levels beyond the typical noise sources associated with existing residential land use in the Project study area.

Reference Noise Levels

To estimate the Project operational noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the proposed Project. Table 10-1 in the Noise Report presents a summary of the reference noise level measurements used in this analysis to describe the Project operational noise levels.

Operational Noise Levels

Based upon the reference noise levels, it is possible to estimate the Project operational stationary-source noise levels at each of the nearby sensitive receiver locations. The operational noise level calculations account for the distance attenuation provided due to geometric spreading, when sound from a localized stationary source (i.e., a point source) propagates uniformly outward in a spherical pattern. With geometric spreading, sound levels attenuate (or decrease) at a rate of 6 dB for each doubling of distance from a point source. Noise levels associated with the mechanical ventilation equipment, trash enclosure activity, a pad-mounted transformer, and playground/park activity are expected to range from 32.8 to 55.3 dBA Leq at the nearby sensitive receiver locations (see Table V-15, column "Total Project Operational Noise Level"). This analysis includes the attenuation provided by intervening structures, including existing and planned noise barriers and the Project buildings.

Project Operational Noise Level Compliance

The LAMC has set exterior noise limits to control community noise impacts from non-transportation noise sources (such as air-conditioning units, refrigeration, heating, pumping, and filtering equipment). Section 112.02 indicates that stationary noise sources shall not operate in such a manner as to cause the noise level at any sensitive use to exceed the existing ambient noise level by 5 dBA. Tables V-15 and V-16 show the Project-only operational noise levels, the closest ambient noise level measurement, and the adjusted operational noise level limits at each of the nearby sensitive receiver locations. Both the daytime and nighttime ambient noise levels

are used to evaluate the potential Project-related operational noise levels, as shown in Tables V-13 and V-14, respectively.

Table V-15 shows the daytime operational noise levels limits, per the City of Los Angeles Municipal Code, will range from 59.2 to 62.2 dBA Leq, and the Project-only operational noise levels ranging from 32.8 to 55.3 dBA Leq will satisfy the standards at each sensitive receiver location.

Table V-15
Daytime Operational Noise Level Compliance (DBA Leq)

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Ambient Plus 5 dBA	Threshold ⁵	Threshold Exceeded? ⁶
R1	40.7	L1	56.7	+5	61.7	No
R2	48.3	L2	56.2	+5	61.2	No
R3	32.8	L3	56.3	+5	61.3	No
R4	55.3	L4	57.2	+5	62.2	No
R5	48.7	L4	57.2	+5	62.2	No
R6	35.4	L5	54.2	+5	59.2	No
R7	37.6	L5	54.2	+5	59.2	No

Notes:
 1 See Exhibit 10-A of the Noise Report for the sensitive receiver locations and noise source locations.
 2 Total Project operational noise levels as shown on Table 10-2 of the Noise Report.
 3 Reference noise level measurement locations as shown on Exhibit 5-A of the Noise Report.
 4 Observed daytime ambient noise levels as shown on Table 5-1 of the Noise Report.
 5 Ambient plus 5 dBA per the Municipal Code Section 112.02(a).
 6 Do the Project operational noise levels exceed the ambient plus 5 dBA threshold identified by the City of Los Angeles?

Table V-16 shows the nighttime operational noise levels limits, per the City of Los Angeles Municipal Code, will range from 54.3 to 57.3 dBA Leq, and the Project-only operational noise levels ranging from 32.8 to 55.3 will satisfy the standards at each sensitive receiver location.

Table V-16
Nighttime Operational Noise Level Compliance (DBA Leq)

Receiver Location ¹	Total Project Operational Noise Level ²	Measurement Location ³	Reference Ambient Noise Levels ⁴	Ambient Plus 5 dBA	Threshold ⁵	Threshold Exceeded? ⁶
R1	40.7	L1	52.3	+5	57.3	No
R2	48.3	L2	49.6	+5	54.6	No
R3	32.8	L3	49.3	+5	54.3	No
R4	55.3	L4	51.0	+5	56.0	No
R5	48.7	L4	51.0	+5	56.0	No
R6	35.4	L5	51.3	+5	56.3	No
R7	37.6	L5	51.3	+5	56.3	No

Notes:
 1 See Exhibit 10-A of the Noise Report for the sensitive receiver locations and noise source locations.
 2 Total Project operational noise levels as shown on Table 10-2 of the Noise Report.

3 Reference noise level measurement locations as shown on Exhibit 5-A of the Noise Report.
 4 Observed daytime ambient noise levels as shown on Table 5-1 of the Noise Report.
 5 Ambient plus 5 dBA per the Municipal Code Section 112.02(a).
 6 Do the Project operational noise levels exceed the ambient plus 5 dBA threshold identified by the City of Los Angeles?

The noise analysis shows that the Project-related operational noise levels will satisfy the City of Los Angeles exterior noise level standards at nearby off-site receiver locations, and therefore, will not generate noise levels which exceed the existing ambient conditions by 5 dBA Leq during the daytime and nighttime hours, respectively. As such, the operational noise level impacts associated with the proposed Project activities, such as the mechanical ventilation equipment, trash enclosure activity, a pad-mounted transformer, and playground/park activity, will be less than significant.

As demonstrated above, the Project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Per the FTA Transit Noise Impact and Vibration Assessment, vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings, but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal, and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. Decibel notation (VdB) serves to reduce the range of numbers used to describe human response to vibration. Typically, ground-borne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Ground-borne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration Standards

The City General Plan and Municipal Code do not identify specific vibration level standards. Therefore, applicable vibration standards identified by the Caltrans Transportation and Construction Vibration Guidance Manual are used in this noise study. The Caltrans vibration manual establishes thresholds for determining potential vibration impacts resulting in building damage. For older residential structures, Caltrans identifies a building damage threshold of 0.3 in/sec PPV which is used in this analysis to evaluate potential Project-related construction vibration impacts at the adjacent receiver locations.

Significance Criteria

Noise impacts shall be considered significant if any of the following occur as a direct result of the Project.

- If short-term Project generated construction vibration levels exceed Caltrans building damage vibration standard of 0.3 in/sec PPV at sensitive receiver locations (Caltrans Transportation and Construction Vibration Guidance Manual, Table 19).

Construction Vibration Impacts

Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. The proposed Project's construction activities most likely to cause vibration impacts are:

- Heavy Construction Equipment: Although all heavy mobile construction equipment has the potential of causing at least some perceptible vibration while operating close to buildings, the vibration is usually short-term and is not of sufficient magnitude to cause building damage.
- Trucks: Trucks hauling building materials to construction sites can be sources of vibration intrusion if the haul routes pass through residential neighborhoods on streets with bumps or potholes. Repairing the bumps and potholes generally eliminates the problem.

Ground-borne vibration levels resulting from construction activities occurring within the Project site were estimated by data published by the FTA. Construction activities that would have the potential to generate low levels of ground-borne vibration within the Project site include grading. Based on the reference vibration levels provided by the FTA, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 in/sec peak-particle-velocity (PPV) at

25 feet. At distances ranging from 29 to 81 feet from primary Project construction activities, construction vibration velocity levels are expected to range from 0.015 to 0.071 in/sec PPV (see Table 11-10 of the Noise Report). Based on the Caltrans older residential building damage threshold of 0.3 in/sec PPV, the proposed Project construction activities would result in vibration levels which are anticipated to remain below the threshold for building damage, and therefore, represents a less than significant impact and no mitigation measures are required.

Operational Vibration

The Project proposes the construction of a 98-unit, 100 percent affordable housing project totaling approximately 101,771 square feet. The Project would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large manufacturing and industrial projects. Groundborne vibrations at the Project Site and immediate vicinity currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, and the proposed land uses at the Project Site would not result in a substantive increase of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur once a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant and no mitigation measures are required.

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

No Impact. Although the Project Site is subject to occasional over flights from jet and propeller aircraft, the Project Site is not within an airport's influence area. The nearest airport to the Project Site is the Santa Monica Airport, which is located approximately two miles to the north of the Project Site. Los Angeles International Airport (LAX) is located approximately three miles south of the Project Site. However, the Project Site is not located within the Airport Influence Area of either the Santa Monica Airport nor Los Angeles International Airport.⁹¹ Moreover, the Project Site is not located within an existing or projected noise contour associated with any private or public airport.⁹² Therefore, no impacts would occur, and no mitigation measures are required.

Cumulative Impacts

Construction

While the timing or sequencing of the related projects is unknown, any quantitative analysis that assumes multiple, concurrent construction projects would be speculative. Construction-period

⁹¹ *Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, June 2012, website: http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf, accessed: April 2019.*

⁹² *Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; website: <http://planning.lacounty.gov/view/alup/>; accessed: April 2019.*

noise and groundborne vibration for the Project and each related project (that has not yet been built) would be localized. The nearest related project to the Project Site is related project LA10, which consists of 65 multi-family residential units at 13488 W. Maxella Avenue (see Figure II-12 in Section II, Project Description, of this document). This project would be approximately 0.28 miles east of the proposed Project, located far enough away that construction activities at that location would have little noise effect and no ground-borne vibration effect on the sensitive residential uses adjacent and to the west of the Project Site. That project would primarily impact the existing residential uses to the north, west, and east of the Project Site. These residential uses would not be affected by noise or vibration from the identified related projects due to their distances from the Project Site. Therefore, the Project would not contribute to a cumulative construction-related noise impact and impacts would be less than significant.

Operation

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the difference between existing traffic volumes and future traffic volumes with the Project and cumulative development. As with the localized construction-related noise impacts, all of the other related projects are located far enough away that on-site equipment and activities at those locations would have no noise effect on the sensitive residential uses in close proximity to the Project Site. On-site equipment at the Project Site would similarly have no noise effect on any sensitive uses in close proximity to the related project sites. Therefore, the Project would not make a cumulatively considerable contribution to a cumulative noise impact associated with stationary and on-site operational noise sources.

14. Population and Housing

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

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

Less Than Significant Impact. A significant impact may occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the area, either directly or indirectly.

Construction

The Project would involve the development of 98 residential apartment units, 68 of which will be reserved for seniors provided in one two-to three-story building (“Senior Building”) and 30 units that will accommodate families provided in several one- and two-story buildings (“Family Units”). The total proposed floor area is approximately 101,771 gross square feet. Construction would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction of the Project. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for the construction of the Project would be taken from the labor pool currently residing in the City. Therefore, the construction workers would not likely relocate their homes as a result of employment on the Project. Impacts on population and housing due to construction activities would be less than significant and no mitigation measures are required.

Operation

The Project would be comprised of 68 residential units reserved for seniors and 30 units that will accommodate families. According to population estimates provided by the US Census Bureau,

there are approximately 2.43 persons per renter-occupied unit in the City of Los Angeles.⁹³ The Project would include up to 98 multi-family residential units, which could generate approximately 238 residents (98 x 2.43).

SCAG's Local Profiles Report for the City estimates 2018 population, housing, and employment numbers for the City. As shown in Table V-17, Population, Housing, and Employment Forecasts for the City of Los Angeles Subregion, the report estimates that there were 4,059,665 residents and 1,480,426 total housing units in the City in 2018.⁹⁴ Moreover, SCAG's RTP/SCS estimates the population of the City will increase to 4,609,400 residents by 2040.⁹⁵ Housing in the City is estimated by SCAG to increase to 1,690,300 housing units by 2040.⁹⁶

**Table V-17
Population and Housing Forecasts
for the City of Los Angeles Subregion**

Area	Population	Households
City of Los Angeles		
SCAG Forecasts		
2018	4,059,665	1,480,426
2035	4,442,500	1,618,900
2040	4,609,400	1,690,300
Percent Change (%)		
2018 to 2035	+9.4	+9.3
2018 to 2040	+13.5	+14.1
Source: Southern California Association of Governments, <i>Local Profiles Report 2019, Profile of the City of Los Angeles, May 2019</i> , website: http://www.scag.ca.gov/Documents/LosAngeles.pdf , page 3, accessed: June 2019. Southern California Association of Governments, <i>2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction</i> website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf , accessed: April 2019.		

Population

The Project would include 98 multi-family residential units, which could generate approximately 238 residents (98 x 2.43). According to SCAG data, the City of Los Angeles subregion had a total population of 4,059,665 persons in 2018. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 382,835 between 2018 and 2035, and by 549,735 persons between 2018 and 2040. The addition of the new residents housed by the

⁹³ United States Census Bureau, *American Community Survey, 2016*, provided by Jack Tso, City of Los Angeles Department of City Planning.

⁹⁴ Southern California Association of Governments, *Local Profiles Report 2019, Profile of the City of Los Angeles, May 2019*, website: <http://www.scag.ca.gov/Documents/LosAngeles.pdf>, page 3, accessed: June 2019.

⁹⁵ Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction* website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed: April 2019.

⁹⁶ Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction* website: http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed: April 2019.

Project would be within the SCAG growth projection, representing approximately 0.06 percent of the Citywide total growth for the period of 2018 to 2035, and approximately 0.04 percent of the Citywide total growth for the period of 2018 to 2040. This increase would not be considered a substantial increase for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the Project would be less than significant and no mitigation measures are required.

Housing

With respect to housing, the Project would introduce up to 98 affordable multi-family residential units to the area. According to SCAG data, the City of Los Angeles subregion had 1,480,426 total housing units in the City in 2018. Estimates extrapolated from SCAG data projects the Citywide housing supply to increase by 138,474 units between 2018 and 2035, and by 209,874 units between 2018 and 2040. The 98 housing units proposed would be within the growth anticipated based on SCAG projections, representing approximately 0.07 percent of the Citywide total housing growth for the period of 2018 to 2035, and approximately 0.04 percent of the Citywide total growth for the period of 2018 to 2040. This increase would not be considered a substantial increase in housing for the area as the addition of 98 new affordable multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the Project would be less than significant and no mitigation measures are required.

Infrastructure

The Project would not require the extension of roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas. The Project does not involve the extension of roadways or infrastructure. As the Project would be supported by the existing infrastructure, indirect population growth impacts would be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere.

The Project Site currently consists of a vacant lot, thus, the Project would not displace existing people or housing, as no residences currently exist on the Project Site. The Project would introduce a net increase of 98 residential units to the City, including 68 units set aside as affordable housing for seniors and 30 units set aside as affordable housing for families. Therefore, no impacts would occur, and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the population and house analysis above, including growth inducement, and housing and population displacement.

Housing and population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects within the study area and other potential development projects that may occur throughout the City of Los Angeles subregion are expected to be largely consistent with their respective General Plan land use designations. Furthermore, SCAG periodically updates its projections for the various subregions that comprise the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative employment growth associated with the Project and other development within the City of Los Angeles subregion will be accommodated in SCAG forecasts over time and the Project would not contribute to a cumulatively considerable effect with respect to employment, housing, and population growth. Therefore, cumulative impacts would be less than significant.

15. Public Services

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 objectives for any of the following public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **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 objectives for fire protection?**

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between high density residential and commercial land uses and an LAFD fire station that houses an engine company is 1.5 miles, and two miles from a station that houses a truck company. If this distance is exceeded, the project in question would be required to install automatic fire sprinkler systems.

The Project would be served primarily by Fire Station No. 63, located at 1930 Shell Avenue, approximately 1.3 roadway miles to the northwest from the Project Site.⁹⁷ Fire Station No. 63 includes a task force and a paramedic rescue ambulance.⁹⁸ The fire station with the nearest engine company is Fire Station No. 62, located at 11970 W Venice Boulevard, approximately 2.3 roadway miles to the northeast from the Project Site.⁹⁹ Accordingly, the Project is required to install automatic fire sprinkler systems.

⁹⁷ City of Los Angeles Fire Department, *Find Your Station*, website: <https://www.lafd.org>, accessed: February 2019.

⁹⁸ City of Los Angeles Fire Department, *Fire Station Directory*, March 2014.

⁹⁹ City of Los Angeles Fire Department, *Fire Station Directory*, March 2014.

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch ("PSI") is to remain in the water system while the required gpm is flowing. LAMC Section 57.507.3.3 identifies a fire flow requirement of 4,000 gallons per minute (gpm) flowing from 4 hydrants simultaneously for high density residential and commercial neighborhood land uses such as the proposed Project as well as the maximum response distances to engine and truck companies discussed above. Moreover, as noted above, the Project would include automatic fire sprinkler systems as required by the Fire Code. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 450 feet. If LAFD were to determine that additional fire hydrants are required during its review of the building design and LAFD requirements, such improvements would be completed as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Construction activities to install any new pipes or pumping infrastructure would be temporary and of short duration and would not result in any significant environmental impacts.

Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., Thatcher Avenue). All improvements proposed would be in compliance with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation.

Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Impacts related to fire protection would be less than significant and no mitigation measures are required.

Cumulative Impacts

Development of the Project in combination with other projects in the vicinity would cumulatively increase the demand for fire protection services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to

achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Moreover, all of the cumulative development would be reviewed by LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant.

- b) 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 objectives for police protection?**

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station, the construction of which could cause significant environmental impacts.

The Project Site is served by the LAPD Pacific Community Police Station, which is located at 12312 Culver Boulevard, approximately 2.4 roadway miles east of the Project Site.¹⁰⁰ The Pacific Community Police Station is under the jurisdiction of LAPD's West Bureau.¹⁰¹ The Project Site is located in Reporting District 1444.¹⁰²

Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

Operation

The Project would result in a change from a vacant paved lot to a development of 98 residential units on the Project Site. The on-site population would increase as a result of the Project, with residents and guests on the site. As required by the City as a regulatory compliance measure,

¹⁰⁰ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: February 2019.

¹⁰¹ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: February 2019.

¹⁰² City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: February 2019.

the Project would implement principles of the City's *Crime Prevention through Environmental Design Guidelines* subject to the approval of LAPD prior to the issuance of building permits.¹⁰³ Specifically, the Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and, where possible, security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. Additionally, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the Project's residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which may cause significant environmental impacts. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Impacts related to police protection would be less than significant and no mitigation measures are required.

Cumulative Impacts

It is anticipated that the Project in combination with other projects in the area would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant.

¹⁰³ *City of Los Angeles Police Department, Crime Prevention Section, Design Out Crime Guidelines: Crime Prevention through Environmental Design, November 1997.*

- c) **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 objectives for schools?**

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the schools serving the project site. The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. The Leroy F. Greene School Facilities Act of 1998 (“SB 50”) sets a maximum level of fees a developer may be required to pay to address a project’s impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. For the Project, the affordable senior units would receive a full waiver for school fees; the affordable family units would get a partial waiver of school fees. As payment of appropriate school fees to LAUSD is required by law and considered to fully address impacts, impacts would be less than significant.

Cumulative Impacts

As discussed above, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, the related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully address any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant.

- d) **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 objectives for parks?**

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project, necessitating new or physically altered parks – the construction of which could cause significant environmental impacts.

The Project would be comprised of 98 residential apartment units, 68 of which will be reserved for seniors and 30 units that will accommodate families. The Project would increase the residential population within the Project area and, thus, would increase demand for public parkland based on the standard minimum parkland-to-population ratio identified by the City. Consistent with the Los Angeles Department of Recreation and Parks’ recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide more than the

required amount of open space on the Project Site. The Project would require 10,800 square feet of open space pursuant to the LAMC based on the total number of units. The Project includes approximately 19,950 square feet of open space and residential amenities would be located in several distinct areas. The Project includes a 600 square-foot recreation room and a 600 square-foot outdoor recreation area, as well as 14,051 square feet of courtyards. The courtyards would include a resident garden, a playground, a fire pit, and seating. Of the required open space, 2,700 square feet is required to be landscaped;¹⁰⁴ 8,111 square feet of the proposed open space would be landscaped. The Project would also provide 4,700 square feet of private open space as balconies on 94 of the residential units. These recreational amenities would help relieve stress on the City's existing park system. In adopting Ordinance 184505 (the most recent amendments to LAMC 12.33 C), the City determined to exempt affordable housing from park fees as a matter of policy. As an affordable housing Project, the Project may be exempt from partial or full park fees that are typically required of residential projects. The payment of fees, as applicable, would address potential impacts to park and recreational facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Development projects that include residential land uses, with the exception of 100 percent affordable housing projects, would be required to pay parks fees (for projects within the City) or other similar purpose fees such as Quimby fees, as appropriate to the projects' location and proposed uses. The payment of fees would address potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant.

- e) 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 objectives for other public facilities?**

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

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to Los Angeles Public Libraries (LAPL) to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide neighborhood public libraries with additional funding to help restore library service hours,

¹⁰⁴ 25% of required common open space is required to be landscaped. 25% of 10,800 square feet is 2,700 square feet.

purchase books, and support library programs, subject to audits, using existing funds with no new taxes. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.¹⁰⁵

Library funding is now mandated under the City Charter to be funded from property taxes. Therefore, impacts to library facilities would be less than significant and no mitigation measures are required.

Cumulative Impacts

The related projects within the City and with a residential component could generate additional residents who could increase the demand upon library services. However, library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with new development. The Project as well as the related projects within the City would be required to pay these property taxes as applicable. Therefore, the cumulative impact would be less than significant.

¹⁰⁵ *Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L.*

16. Recreation

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

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

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for park or recreational facilities that would cause substantial physical deterioration of the park facilities. As discussed in response to Checklist Question 15(d), above, the Project would require 10,800 square feet of open space pursuant to the LAMC based on the total number of units. The Project includes approximately 19,950 square feet of open space and residential amenities would be located in several distinct areas. These recreational amenities would help relieve stress on the City's existing park system. In adopting Ordinance 184505 (the most recent amendments to LAMC 12.33 C), the City determined to exempt affordable housing from park fees as a matter of policy. As an affordable housing Project, the Project may be exempt from partial or full park fees that are typically required of residential projects. The payment of fees, as applicable, would address potential impacts to park and recreational facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project includes open spaces and recreational amenities, the construction of which could have an adverse significant impact related to construction activities. The construction impacts related to the Project's open spaces and recreational amenities would be part of the overall construction impacts, and would not be unique to the open spaces or recreational amenities. As discussed in response to Question 15(d), above, the LAMC would

require 10,800 square feet of open space based on the total number of units. The Project includes approximately 19,950 square feet of open space and residential amenities would be located in several distinct areas. These recreational amenities would help relieve stress on the City's existing park system. In adopting Ordinance 184505 (the most recent amendments to LAMC 12.33 C), the City determined to exempt affordable housing from park fees as a matter of policy. As an affordable housing Project, the Project may be exempt from partial or full park fees that are typically required of residential projects. The payment of fees, as applicable, would address potential impacts to park and recreational facilities. Therefore, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Development projects that include residential land uses, with the exception of 100 percent affordable housing projects, would be required to pay Parks Fees (for projects within the City) or other similar purpose fees such as Quimby fees, as appropriate to the projects' location and proposed uses. The payment of fees would address potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant.

17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following traffic impact analysis summarizes and incorporates by reference the information provided in the *Technical Memorandum – Thatcher Yard Residential Project* prepared by Linscott, Law & Greenspan, Engineers in January 2019 (the “Traffic Memo”). LADOT issued assessment letters for the Traffic Memo on July 9, 2018 and February 28, 2019 accepting the findings of the Traffic Memo.¹⁰⁶ The Traffic Memo was prepared in compliance with the requirements of the LADOT as provided in LADOT’s Transportation Impact Study Guidelines (December 2016 edition). Additionally, Linscott, Law & Greenspan, Engineers prepared a *Traffic Analysis Addendum for the Thatcher Yard Affordable Housing Project at 3221-3233 Thatcher Avenue* on August 27, 2019 to address Senate Bill (SB) 743. The Traffic Memo, Addendum, and LADOT assessment letters are available as Appendix H to this document.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with an applicable plan, ordinance, or policy related to the overall circulation system.

Existing Conditions

¹⁰⁶ The LADOT-signed Traffic Study Memorandum of Understanding is included as Appendix A to the Traffic Memo, which is included as Appendix H to this document.

This traffic assessment evaluates the potential traffic impact of the Project on the local street system. The following intersections have been evaluated for potential traffic impacts due to the Project:

- Lincoln Boulevard / Washington Boulevard
- Lincoln Boulevard / Jefferson Way
- Lincoln Boulevard / Marina Pointe Drive-Maxella Avenue
- Lincoln Boulevard / SR-90 Ramps

The intersections selected for analysis were identified as they are located closest to the Project site, and therefore have the greatest potential to have adverse traffic impacts related to the Project. Further away from the Project site, project-related traffic disperses, and thus, the potential for significant traffic impacts diminishes. The existing lane configurations and traffic control devices at the study intersections are provided on Figure 4 of the Traffic Memo.

Existing Traffic Volumes

Manual traffic counts of vehicular turning movements were conducted during the week of April 16, 2018 at the study intersections during the weekday morning and afternoon commuter periods to determine the peak hour traffic volumes. The manual traffic counts at the study intersections were conducted from 7:00 AM to 10:00 AM to determine the AM peak commuter hour, and from 3:00 PM to 6:00 PM to determine the PM peak commuter hour.

The summary data worksheets of the manual traffic counts at the study intersections are provided in Appendix A attached to the Traffic Memo, which is included as Appendix H to this document. The existing peak hour volumes at each study intersection are shown on Figure 5 of the Traffic Memo.

Project Trip Generation

Traffic volumes expected to be generated by the proposed Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using the affordable housing trip rates published in Table 5 of the LADOT *Transportation Impact Study Guidelines* (December 2016). The following trip generation rates were used to forecast the traffic volumes expected to be generated by the Project land use components:

1. Affordable Senior Housing: LADOT Affordable Housing (Seniors) trip generation average rates were used to forecast the traffic volumes expected to be generated by the affordable senior housing component of the Project.
2. Affordable Family Housing: LADOT Affordable Housing (Family) trip generation average rates were used to forecast the traffic volumes expected to be generated by the affordable family housing component of the Project.

As stated in the LADOT *Transportation Impact Study Guidelines*, the trip rates for affordable housing projects have been derived based on traffic counts conducted by LADOT at similar projects. In general, the LADOT affordable (and senior) trip generation rates result in fewer trips generated as compared to trip rates for market-rate (and non-age restricted) units provided in reference documents such as the *Trip Generation* manual published by the Institute of Transportation Engineers (ITE).

As shown in Table 1 of the Traffic Memo (see Appendix H to this document), the Project on a typical weekday is forecast to result in 239 net new daily trips (e.g., 120 inbound trips, 119 outbound trips), 23 net new AM peak hour trips (9 inbound trips and 14 outbound trips), and 20 net new PM peak hour trips (11 inbound trips and 9 outbound trips).

Traffic Volume Forecast

As required by LADOT, the Traffic Memo evaluates the potential impacts of the Project through analysis of the following traffic volume conditions:

- Existing
- Existing with Project
- Future
- Future with Project

As previously noted, the existing traffic volumes at the study intersections are presented in Figure 5 of the Traffic Memo.

Figure 6 of the Traffic Memo provides the forecast assignment of Project-related trips to the local street system on a percentage basis. It is noted that the Project includes the proposed closure of the portion of S. Thatcher Avenue between the two Princeton Drive intersections (north intersection and south intersection). Further, the existing gate that is provided on Princeton Drive east of S. Thatcher Avenue would be removed to accommodate Project-related traffic. Accordingly, all Project-related traffic would utilize Princeton Drive east of S. Thatcher Avenue, as well as Jefferson Way to access Lincoln Boulevard. The Project trip assignment shown on Figure 6 of the Traffic Memo reflects the proposed closure of S. Thatcher Avenue.

The AM and PM peak hour trips forecast to be generated by the Project are applied to the distribution percentages provided on Figure 6 of the Traffic Memo. The resultant forecast weekday AM and PM peak hour traffic volumes associated with the Project at the study intersections are shown on Figure 7 of the Traffic Memo.

The forecast traffic volumes associated with the Project at the study intersections are then added to the existing volumes to obtain the Existing with Project traffic volumes, which are shown on Figure 8 of the Traffic Memo.

The Future Pre-Project traffic volumes were forecast through application of a two percent (2.0%) annual traffic growth factor to the existing traffic volumes from the date of the traffic counts through the Project build-out year of 2021. Figure 9 of the Traffic Memo provides the Future Pre- Project

traffic volumes at the study intersections. The Future with Project traffic volumes at the study intersections are provided on Figure 10 of the Traffic Memo.

Impact Criteria and Levels of Service Calculations

The study intersections were evaluated using the Critical Movement Analysis (CMA) method of analysis that determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. Level of Service varies from LOS A (free flow) to LOS F (jammed condition). A description of the CMA method and corresponding Level of Service is provided in Appendix B to the Traffic Memo, which is included as Appendix H to this document.

The relative impact of the added project traffic volumes to be generated by the Project during the AM and PM peak hours was evaluated based on analysis of future operating conditions at the study intersections, without and with the Project. The previously discussed capacity analysis procedures were utilized to evaluate the future v/c relationships and service level characteristics at each study intersection.

The significance of the potential impacts of project generated traffic was identified using the traffic impact criteria set forth in the *Transportation Impact Study Guidelines*. According to the City's published traffic study guidelines, the impact is considered significant if the project-related increase in the v/c ratio equals or exceeds the thresholds presented in Table V-18.

Table V-18
Significant Impact Definition

Level of Service	Final Volume/Capacity (V/C) Ratio	Project-Related Increase in V/C
C	> 0.701 - 0.800	equal to or greater than 0.040
D	> 0.801 - 0.900	equal to or greater than 0.020
E, F	> 0.901	equal to or greater than 0.010
<i>Source: City of Los Angeles Transportation Impact Study Guidelines, December 2016.</i>		

Traffic Impact Analysis

The traffic impact analysis prepared for the study intersections using the CMA methodology and application of the City of Los Angeles significant traffic impact criteria are summarized for the Project in Table V-19. The CMA data worksheets for the analyzed intersections are contained in Appendix B to the Traffic Memo, which is included as Appendix H to this document.

Table V-19
Summary of Volume to Capacity Ratios and Levels of Service

No.	Intersection	Peak Hour	Year 2018 Existing		Year 2018 with Project				Year 2021 Future Pre-Project		Year 2021 Future with Project			
			V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?
1	Lincoln Boulevard / Washington Boulevard	AM	0.858	D	0.860	D	0.002	NO	0.917	E	0.918	E	0.001	NO
		PM	0.775	C	0.777	C	0.002	NO	0.829	D	0.831	D	0.002	NO
2	Lincoln Boulevard / Jefferson Way	AM	0.426	A	0.436	A	0.010	NO	0.459	A	0.468	A	0.009	NO
		PM	0.503	A	0.511	A	0.008	NO	0.540	A	0.548	A	0.008	NO
3	Lincoln Boulevard / Marina Pointe Drive-Maxella Avenue	AM	0.576	A/F	0.576	A/F	0.000	NO	0.616	B/F	0.618	B/F	0.002	NO
		PM	0.586	A/F	0.587	A/F	0.001	NO	0.627	B/F	0.628	B/F	0.001	NO
4	Lincoln Boulevard / SR-90 Ramps ^a	AM	0.654	B/F	0.656	B/F	0.002	NO	0.700	C/F	0.701	C/F	0.001	NO
		PM	0.675	B/F	0.676	B/F	0.001	NO	0.723	C/F	0.724	C/F	0.001	NO

^a Based on field observations, vehicle movements are constrained at times during peak periods due to downstream conditions. Therefore, a LOS F value has been assigned to describe existing and future conditions.
Source: Linscott, Law & Greenspan, Engineers, Technical Memorandum – Thatcher Yard Residential Project, January 2019.

As indicated in Table V-19, two of the four study intersections are presently operating at LOS D or better during the weekday AM and PM peak hours under existing conditions. The following intersections are presently operating at LOS E or worse during the peak hours shown below under existing conditions¹⁰⁷:

- Int. No. 3: Lincoln Boulevard / Marina Pointe Drive-Maxella Avenue (LOS F – Both Peak Hours)
- Int. No. 4: Lincoln Boulevard / SR-90 Ramps (LOS F – Both Peak Hours)

For the Existing with Project condition, following construction and occupancy of the Project, the forecast changes in v/c ratios at the four study intersections due to Project-related traffic are calculated to be below the City's significance thresholds as shown in Table V-19. Therefore, the traffic impacts of the Project in the Existing with Project condition will be less than significant for the four study intersections.

For the Future Pre-Project conditions, as presented in Table V-19, three of the four study intersections are forecast to operate at LOS D or better during the peak hours. The following intersections are forecast to operate at LOS E or worse during the peak hours shown below under future pre-project conditions:

- Int. No. 1: Lincoln Boulevard / Washington Boulevard (LOS E – AM Peak Hour)
- Int. No. 3: Lincoln Boulevard / Marina Pointe Drive-Maxella Avenue (LOS F – Both Peak Hours)
- Int. No. 4: Lincoln Boulevard / SR-90 Ramps (LOS F – Both Peak Hours)

As shown in Table V-19, the traffic impacts in the Future with Project condition will be less than significant for the four study intersections with application of the City's thresholds.

Construction Traffic

The Project would require the use of a variety of construction vehicles throughout the Project construction. Typical construction schedules create trips outside of the traffic peak hours. It is anticipated that there would be no hauling during the PM peak hour, and that construction workers would arrive at the Project Site prior to the AM peak hour, which is typical construction industry practice. Operation of the Project would generate new residents, which would result in increased

¹⁰⁷ Based on field reviews, it was observed during the commuter peak hours that traffic flow at Intersection Nos. 3 and 4 (Lincoln Boulevard/Marina Pointe Drive-Maxella Avenue and Lincoln Boulevard/SR-90 Ramps) was constrained due to the relatively close proximity of the two intersections. For example, it was observed that northbound traffic flow on Lincoln Boulevard at the SR-90 intersection would have a green traffic signal, but vehicles were not able to travel through the intersection due to a red traffic signal for northbound traffic at the nearby Marina Pointe Drive- Maxella Avenue intersection. As the constraints artificially limit the amount of traffic that travels through the intersections, the resulting v/c ratios and corresponding Levels of Service may understate actual conditions. Accordingly, as noted on Table V-19, an LOS F service level was assigned such that the most sensitive impact threshold would apply for purposes of assessing the potential transportation impacts of the project at these two affected intersections.

vehicle trips on area roadways that could degrade existing performance levels of roadway facilities.

Transit, Bicycle, and Pedestrian facilities

Although operation of the Project would generate new residents on the Project Site which may increase the demand for public transit, the Project does not propose any changes to area transit and therefore would not conflict with any applicable programs, plans, ordinances, or policies related to transit which may affect the performance of existing transit conditions in the area. To encourage and facilitate the use of public transportation and bicycle use, the Project would provide 42 long-term bicycle parking spaces and 10 short-term bicycle parking spaces, plus an additional 20 bicycle parking spaces.

The Project Site is bounded on three sides by public streets – Oxford Avenue, Princeton Drive, Thatcher Avenue – and a private street, Harbor Crossing Lane. All three public streets are designated “Local Streets” in the Mobility Plan 2035. The nearest thoroughfares are Washington Boulevard, less than 0.3 miles north, and Lincoln Boulevard, less than 0.2 miles east, of the Property. The Mobility Element 2035 identifies both Washington Boulevard and Lincoln Boulevard as an important pedestrian segments within the Mobility Plan’s Pedestrian Enhanced District analysis as corridors where pedestrian improvements on arterial streets could be prioritized to provide better walking connections to and from the major destinations within communities. The Project addresses the goals of this analysis by providing more attractive and wider sidewalks and street trees.

As discussed above, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. Impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project would cause a conflict in Congestion Management Program (CMP).

Metro administers the CMP throughout Los Angeles County. An analysis of the potential impact on CMP monitored regional facilities is a requirement of the traffic impact analysis. The analysis was conducted per the 2010 Los Angeles County Congestion Management Program (Metro, 2010)(CMP) Guidelines. The CMP is a program mandated by the State of California that serves as the monitoring and analytical basis of transportation funding decisions in the County made through the Regional Transportation Improvement (RTIP) and State Transportation Improvement Program (STIP) processes.

Chapter 5 of the CMP guidelines establishes thresholds for impacts. A CMP analysis of a freeway mainline segment is required if 150 or more trips per hour will be added in either direction as a direct result of a project’s proposed development. Additionally, If the trips from the new

development result in 50 or more peak hour trips being added to a CMP Arterial Monitoring Station, a CMP analysis of the intersection is required.

The proposed Project's trips, 23 net new AM peak hour trips, and 20 net new PM peak hour trips during a typical weekday, are fewer than 150 in either peak hour. As a result, the threshold of significance for a freeway mainline analysis is not met. Therefore, no further analysis is required for these arterial monitoring stations.

The Project's Traffic Memo was prepared prior to adoption of the Vehicle Miles Traveled (VMT) criteria for determining transportation impacts under CEQA. Although the Project is not subject to the VMT criteria for this reason, Linscott, Law & Greenspan, Engineers have evaluated VMT as an addendum to the previously prepared and approved transportation analysis. The analysis was prepared using the LADOT VMT Calculator, and the results are contained within Appendix H to this checklist. As shown in the VMT Calculator, the Project would generate 242 net new daily vehicle trips. Section 2.2.2 of the 2019 Guidelines state that if a project will not generate a net increase of 250 or more daily vehicle trips, a "no impact" determination can be made. Therefore, the Project is not expected to generate a VMT impact, and no further analysis is required.

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

No Impact. A significant impact may occur if a project includes new roadway design or introduced a new land use or project features into an area with specific transportation requirements, characteristics, or project access or other features designed in such a way as to create hazardous conditions. No hazardous design features or incompatible land uses would be introduced with the Project that would create significant hazards to the surrounding roadways. The Project proposes a land use that complements the surrounding urban development and utilizes the existing roadway network. Vehicular access to the Project Site would be provided via the existing driveway along the west side of Thatcher Avenue. The Project Site driveway would provide access to the subterranean parking garage, and would accommodate full vehicular access (i.e., left-turn and right-turn ingress and egress turning movements). The Project's driveway would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety.

Additionally, the existing gate on Princeton Drive east of Thatcher Avenue would be relocated to Thatcher Avenue north of the intersection at Princeton Drive as part of the Project. This would direct all Project vehicle traffic to enter and exit onto Lincoln Boulevard via Princeton Drive.

Therefore, no impacts would occur, and no mitigation measures are required.

d) Would the project result in inadequate emergency access?

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

As previously discussed under threshold question 9.f), above, there are no critical facilities and lifeline systems in the immediate vicinity of the Project Site, and none of the roadways that run adjacent to the Project Site are identified as a disaster route by either the City or by Los Angeles County. Moreover, the Project would not cause permanent alterations to vehicular circulation routes and patterns, nor impede public access or travel upon public rights-of-way. As shown under threshold question 17.a) above, the Project would not result in a significant impact to roadway performance.

Emergency vehicle access to the Project Site would continue to be provided from local roadways (i.e., Thatcher Avenue). All improvements proposed would be in compliance with the Fire Code and LAMC requirements to ensure proper emergency access, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation. Moreover, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lane of opposing traffic. As the Project would not significantly impact roadway performance and based on the above considerations, it is anticipated that LAFD and LAPD would be able to respond to on-site areas within the established response time. Even so, the Project would be subject to the site plan review requirements of LAFD and LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. Therefore, impacts related to emergency access would be less than significant and no mitigation measures are required.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the 21 related projects with respect to the topics listed in the traffic analysis above. The cumulative impacts study area for transportation and traffic is similar to the study area for the Project traffic analysis.

With respect to construction traffic, it is unknown whether or not any of the related projects would have overlapping construction schedules with the Project. However, similar to the Project, the related projects would be required to submit formal construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. These approved plans would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that the related projects would comply with this requirement, similar to the Project, and as such, the cumulative construction traffic impact would be less than significant and no mitigation measures are required.

The Traffic Memo includes cumulative analysis by increasing the Future Pre-Project traffic volumes at an annual rate of one percent per year to the year 2020 (i.e., the anticipated year of Project build-out). The ambient growth factor was based on general traffic growth factors provided in the CMP manual and determined in consultation with LADOT staff. Application of an annual growth factor of 1 percent allows for a conservative, worst case forecast of future traffic volumes in the area.

Following construction and occupancy of the Project, the forecast future (2022) changes in v/c ratios at the three study intersections due to Project-related traffic are calculated to be below the City's significance thresholds. Therefore, the Project would not have a cumulatively considerable contribution to impacts related to traffic and impacts would be less than significant.

18. Tribal Cultural Resources

<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>	<p>Potentially Significant Impact</p>	<p>Less Than Significant with Mitigation Incorporated</p>	<p>Less Than Significant Impact</p>	<p>No Impact</p>
<p>a. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>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)?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following traffic impact analysis summarizes and incorporates by reference the information provided in the *Tribal Cultural Resources Assessment for the Thatcher Yard Project, Los Angeles, California* prepared by SWCA Environmental Consultants in August 2019 (the “TCR Report”). The TCR Report is available as Appendix I to this document.

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

Less Than Significant Impact with Mitigation Incorporated. Tribal Cultural Resources (TCR) includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. Public Resources Code Section 21084.2 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or if such resource is 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. PRC 5024.1(c) states that “[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question 5, Cultural Resources, the Project Site and immediately surrounding areas are within proximity of an area of known archaeological sites or archaeological survey areas.¹⁰⁸ Additionally, a Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) in May 2019, on behalf of the Project yielded positive results.¹⁰⁹ Although the Project Site is located in a highly urbanized area of the Venice Community

¹⁰⁸ *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

¹⁰⁹ *Correspondence from Steven Quinn, Associate Governmental Program Analyst, Native American Heritage Commission, May 15, 2019. (See Appendix I to this document)*

Plan Area of the City of Los Angeles, and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and export of approximately 4,800 cubic yards of soil. Thus, the potential exists for the unanticipated discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, a Tribal Cultural Resources report (TCR Report) has been prepared for the Project. On July 17, 2019, SWCA conducted a confidential search of the CHRIS records at the South Central Coastal Information Center (SCCIC) on the campus of California State University, Fullerton. The CHRIS records search did not identify any known tribal cultural resources in the Project site. However, several lines of evidence, including the Sacred Lands File search, indicate that the potential exists for unrecorded tribal cultural resources in the form of buried features or artifacts, as well as Native American burials in the Project area. The likelihood of tribal cultural resource presence within the Project Site was mapped as areas of high, moderate, and low sensitivity. The sensitivity assessment considered Native American settlement patterns within the Ballona area, proximity to closest known sites, and historical impacts to the physical setting. The sensitivity for tribal cultural resources is highest along the southernmost portion of the Project site and within naturally occurring alluvial sediments found below deposits of artificial fill, which otherwise characterize large portions of the Project Site. The potential for impacts to tribal cultural resources exists only in those places where the Project activities are likely to encounter alluvial sediments. Conversely, where proposed ground disturbances are proposed exclusively within artificial fill, any tribal cultural resources that might be present in the underlying alluvium would remain preserved, and Project-related impacts would be avoided.

The Project would require removal of all paved surfaces within the Project site and excavation for a basement level. Excavation for the basement level is expected to extend four feet below grade within a 32,925-square-foot area (0.76 acre) measuring approximately 458 by 72 feet. The footprint of the basement level includes areas mapped as low, moderate, and high sensitivity for tribal cultural resources. The high and moderate areas are the most likely to contain underlying alluvial sediments in which tribal cultural resources could occur. Excavation within the low sensitivity zone is expected only occur within artificial fill. Within the remainder of the Project Site, the pavement removal is only expected to result in disturbances to the near surface, which appears to be primarily characterized by artificial fill. Because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measures MM TCR-1 through TCR-4 are required.

The Project would also be required to follow procedures detailed in California Public Resources Code Section 21083.2. The required mitigation and regulatory compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. As discussed in Section IV., RTP/SCS Program EIR Mitigation Measures, the Project incorporates by reference and is consistent with SCAG 2016-2040 RTP/SCS Mitigation Measure MM RTP/SCS-CUL-2(b). Compliance with regulatory requirements and with the Project-specific mitigation measure fulfills the RTP/SCS mitigation measure and goes beyond the scope of MM RTP/SCS-CUL-2(b).

Mitigation Measures

MM TCR-1. Prior to commencing any ground disturbance activities at the Project site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground disturbance activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. Any qualified tribal monitor(s) shall be approved by the Gabrielino Tongva Indians of California Tribal Council. Any qualified archeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources (“OHR”).

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archeological monitor and tribal monitor. The Applicant shall maintain on the Project site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface 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 within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, 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 OHR.

2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
3. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has

complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.

8. 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 South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

The Project would also be required to follow procedures detailed in California Public Resources Code Section 21083.2. Adherence to the required mitigation and regulatory compliance measures would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Therefore, impacts would be less than significant after mitigation.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant, pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public 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 with Mitigation Incorporated. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As previously discussed under Question 5.b), the Project Site is within proximity of an area of known archaeological sites or archaeological survey areas.¹¹⁰ Additionally, a Sacred Lands File

¹¹⁰ *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified*

search conducted by the Native American Heritage Commission (NAHC) in May 2019, on behalf of the Project yielded positive results.¹¹¹ Although the Project Site is located in a highly urbanized area and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and export of approximately 4,800 cubic yards of soil. Thus, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the site is excavated, and because there is a potential for previously unknown cultural resources to be present in the Project area, mitigation measure MM TCR-1 is required.

Additionally, in the event of unforeseen and inadvertent discovery of TCRs, the Project would be required to comply with PRC Section 21074. In the event that objects or artifacts that may be TCRs are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the Project Site until the potential TCRs are properly assessed following specific protocol required by the Department of City Planning. Implementation of mitigation measure MM TCR-1 and compliance with PRC Section 21074 would mitigate any potentially significant impact, and impacts would be less than significant.

Cumulative Impacts

The focus of this cumulative impacts analysis is on the combined impact of the Project and the related projects with respect to the topics listed in the TCRs analysis above. The cumulative impacts study area for TCRs is the extent of the related projects.

As discussed above, the Project Site is within proximity of an area of known archaeological sites or archaeological survey areas.¹¹² Additionally, a Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) in May 2019, on behalf of the Project resulted in positive results.¹¹³ However, the nearest related project to the Project Site is related project LA10, which consists of 65 multi-family residential units at 13488 W. Maxella Avenue (see Figure II-12 in Section II, Project Description, of this document). This related project would be approximately 0.28 miles east of the proposed Project. It is unknown whether related project LA10 or any other related project contains identified sites, features, places, or cultural landscapes that have been geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. However, the Project is required to implement mitigation measure MM TCR-1 and all applicable regulatory requirements to mitigate the potential for TCRs to be disturbed by the Project. It is unlikely, because of the distance between the Project and the related projects, and any resources would be shared amongst the sites. However, any related project sites that would be required to comply with PRC Section 21074

August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.

¹¹¹ *Correspondence from Steven Quinn, Associate Governmental Program Analyst, Native American Heritage Commission, May 15, 2019. (See Appendix I to this document)*

¹¹² *City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1, Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles.*

¹¹³ *Correspondence from Steven Quinn, Associate Governmental Program Analyst, Native American Heritage Commission, May 15, 2019. (See Appendix I to this document)*

governing TCRs. As the Project would fully mitigate any potential impact to TCRs through implementation of mitigation measure MM TCR-1 and all applicable regulatory requirements, cumulative impacts would not be considerable and impacts would be less than significant.

19. Utilities and Service Systems

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

- a) **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities to such a degree that the construction or relocation of which could cause significant environmental effects.

Water Facilities

As detailed below in response to Question 19.b), sufficient water supplies would be available to serve the Project and no new offsite lines would be required. Additionally, as discussed in response to Question 15.a), LAMC Section 57.507.3.3 identifies a fire flow requirement of 4,000 gallons per minute (gpm) flowing from 4 hydrants simultaneously for high density residential and commercial neighborhood land uses such as the proposed Project. Pursuant to LAMC Section 57.507.3.2, an approved fire hydrant must be located within 450 feet. If LAFD were to determine that additional fire hydrants are required during its review of the building design and LAFD requirements, such improvements would be completed as part of the Project either on-site or off-site within the right-of-way under the City's B-Permit process. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by LADWP and LAFD, respectively, under their own independent environmental analysis. The Project would require construction of new, on-site water distribution lines to serve the new buildings. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor offsite work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, the construction of new water facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Wastewater Facilities

As detailed below in response to Question 19.c), the Project's wastewater would be treated by the Hyperion Treatment Plant (HTP), which has adequate capacity to serve the Project. Accordingly, it is not anticipated that the Project would require the construction of new wastewater treatment facilities. During construction of the Project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Therefore, wastewater generation from Project construction activities is not anticipated to cause any increase in wastewater flows. The Project would require construction of new on-site wastewater infrastructure to serve the new building, and potential upgrade and/or relocation of existing infrastructure. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor offsite work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor offsite work along the Project frontage may be required in order to connect to the public main. All offsite work would be performed in consultation and under the approval of the Bureau of Sanitation. Furthermore, as part of the building permit process, the City will require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation,

which would be a temporary action. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Stormwater Drainage Facilities

As detailed above in response to Question c(iii) in Section 10, Hydrology and Water Quality, the Project BMPs would be required to control stormwater runoff with no increase in runoff resulting from the Site, and runoff would continue to discharge to the surrounding stormwater infrastructure and drain to the same stormwater systems. As such, stormwater runoff from the Project Site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. However, should the City determine improvements to the stormwater drainage system are necessary during the normal permit review process, the Applicant would be responsible for the improvements, and such improvements would be conducted as part of the Project either on-site or offsite within the right-of-way, and as such, any related construction activities would be temporary and of short duration. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. Impacts would be less than significant and no mitigation measures would be required.

Electric Power Facilities

The LADWP would supply the Project from the existing electrical system. However, the Project would require an on-site transformation facility and may require underground line extensions on public streets. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the LADWP. Electricity demand during construction 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. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities. Table V-20 presents the estimated electricity consumption by the Project during operation. As shown, operation of the Project is estimated to require approximately 551,397 kWh of electricity per year. Based on LADWP's 2017 Final Power Strategic Long-Term Resource Plan, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 22,613 GWh of electricity.^{114,115} As such, the Project-related net increase in annual electricity consumption of 551,397 kWh/year would represent approximately 0.002 percent of LADWP's projected sales in 2021. Furthermore, as discussed in response to Question 6.a), the incorporation of the 2016 Title 24 standards into the Project would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy. Therefore, the construction of new electric power facilities would not result in significant environmental effects. Impacts would be less than significant and no mitigation measures would be required.

Table V-20

¹¹⁴ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

¹¹⁵ LADWP, 2017 Final Power Strategic Long-Term Resource Plan, December 2017, Appendix A.

Estimated Project Electricity Consumption

Land Use	Size	Consumption Rate (kWh/year) ^a	Consumption (kWh)
Residential	98 units	5,626.5/unit	551,397
Total Estimated Project Electricity Consumption			551,397
Notes: kWh = kilowatt hours; sf = square feet			
^a Consumption rate is taken from SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			
Source (table): EcoTierra Consulting, 2019.			

Natural Gas Facilities

SoCalGas would supply the Project from the existing natural gas facilities. However, the Project would require construction of new, on-site gas distribution lines to serve the new buildings. Connection to existing natural gas facilities would be done in coordination with and under the supervision of SoCalGas. Construction activities typically do not involve the consumption of natural gas. Accordingly, there would be no demand generated by construction.

Table V-21 presents the estimated natural gas consumption by the Project during operation. As shown, operation of the Project is estimated to require approximately 393,127 cf/month (13,104 cf/day) of natural gas. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf/day in 2022 (the Project's buildout year).¹¹⁶ As such, the Project would account for approximately 0.0003 percent of the forecasted consumption of natural gas in SoCalGas' planning area for 2022. Furthermore, as discussed in response to Question 6.a), the Project would comply with 2016 Title 24 energy conservation standards for insulation, glazing, lighting, shading, and water and space heating systems in all new construction. Therefore, the construction of new natural gas facilities would not result in significant environmental effects. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Table V-21
Estimated Project Natural Gas Consumption

Land Use	Size	Consumption Rate (cf/month) ^a	Consumption (cf/month)
Residential	98 units	4,011.5/unit	393,127
Total Estimated Project Natural Gas Consumption			393,127
Notes: cf = cubic feet; sf = square feet			
^a Consumption rate is taken from SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.			
Source (table): EcoTierra Consulting, 2019.			

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the Project Applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate and avoid or implement the orderly relocation of telecommunication facilities that need to be removed or relocated. Therefore, the relocation of new telecommunication facilities would

¹¹⁶ California Gas and Electric Utilities, 2018 California Gas Report, p. 102.

not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the Applicant and/or the successor on an ongoing basis. Upgrades to existing telecommunication facilities and construction of new facilities to meet the demand of users is determined by providers and is subject to its own environmental review. Accordingly, Project impacts to telecommunication facilities would be less than significant and no mitigation measures would be required.

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

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft.

The LADWP *2015 Urban Water Management Plan* confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles. The *2015 Urban Water Management Plan* water demand projection for 2040 is approximately 710,800 af/y for average years, 753,400 af/y for single-dry years, and 725,000 af/y for multiple-dry years. As shown in Table V-22 below, the Project would consume approximately 14,424 gpd (16 af/y) of water. This amount would represent approximately 0.002 percent of the water supply in 2040 in average, single-dry, and multiple-dry years. Furthermore, these projections are considered to be conservative as the Bureau of Sanitation generation rates used to calculate the Project's estimated water consumption do not account for any water conservation features required by local and State policies and regulations. In accordance with LAMC Sections 122.00 - 122.10 and the City's Green Building Code Section 99.4.304.2, the Project would be required to implement water saving features to reduce the amount of water used by the Project including high efficiency toilet and urinals, low flow showerheads and faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and Jacuzzis. All fixtures would be required to meet applicable flush volumes and flow rates. In addition, the Project would be prohibited from using single-pass cooling systems. The Project would also be required to adhere to the City's Irrigation Guidelines and utilize smart irrigation with automatic sensors to determine when irrigation is needed and when irrigation should be suspended due to rain or wind conditions. Compliance with these

requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, would further reduce the above projected water demand below the sewage generation factors assumed by the City's Bureau of Sanitation.

**Table V-22
Estimated Daily Water Consumption**

Land Use	Size	Consumption Rate ^a (gpd)	Total Consumption (gpd)	Total Consumption (af/y)
Apartment: 1 Bedroom	76 du	132/du	10,032	11.2
Apartment: 2 Bedroom	13 du	180/du	2,340	2.6
Apartment: 3 Bedroom	9 du	228/du	2,052	2.2
Total Estimated Water Consumption			14,424	16
Notes: gpd = gallons per day; af/y = acre-feet per year; du = dwelling unit; sf = square feet				
^a Consumption rate based on 120 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.				
Source (table): EcoTierra Consulting, 2019				

Consideration of existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2040. Any shortfall in LADWP controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.¹¹⁷ Therefore, the amount of new annual demand from the Project would be insignificant relative to available supplies through 2040, projected growth in Los Angeles, and planned water resource development by LADWP. Moreover, the addition of 98 dwelling units as a result of the Project would be consistent with Citywide growth, and thereby accounted for in the 2015 UWMP. Thus, the Project's estimated water demand would be within overall General Plan projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2015 UWMP.

Based on the above, sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Accordingly, impacts would be less than significant and no mitigation measures would be required.

- c) **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. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

¹¹⁷ City of Los Angeles Department of Water and Power, *Urban Water Management Plan 2015*, June 7, 2016, website: <http://www.ladwp.com/uwmp>, accessed: February 2019.

The City's Bureau of Sanitation provides sewer service to the Project area. The Project Site currently has existing sewer connections to the City's sewer system. Sewage from the Project site is conveyed via existing sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 275 mgd in dry weather, which can double in wet weather; however, the HTP has capacity to treat a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd.¹¹⁸ This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HTP.

Estimated wastewater generation for the Project is presented below in Table V-23, Estimated Average Daily Wastewater Generation. As shown, the Project would generate approximately 12,020 net gpd (0.012 mgd) of wastewater. Therefore, the HTP would have adequate capacity to serve the Project's demand in addition to its existing commitments. Impacts would be less than significant and no mitigation measures are required.

**Table V-23
Estimated Average Daily Wastewater Generation**

Land Use	Size	Generation Rate ^a	Total Wastewater Generated (gpd)
Apartment: 1 Bedroom	76 du	110/du	8,360
Apartment: 2 Bedroom	13 du	150/du	1,950
Apartment: 3 Bedroom	9 du	190/du	1,710
Total Estimated Wastewater Generation			12,020
<i>Notes: du = dwelling units; gpd = gallons per day; sf = square feet</i>			
<i>^a Generation rate based on 100 percent of City of Los Angeles Bureau of Sanitation sewerage generation factors.</i>			
<i>Source (table): EcoTierra Consulting, 2019.</i>			

- d) **Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the City is serviced by the Sunshine Canyon Landfill. The

¹¹⁸ City of Los Angeles Department of Public Works, Bureau of Sanitation, Clean Water, Hyperion Water Reclamation Plant, website: <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>, accessed: April 2019.

landfill accepts residential, commercial, and construction waste. Solid waste from the project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers.

Construction of the Project would generate construction and demolition waste. Demolition waste would consist primarily of removal of the existing paving and asphalt and is estimated to total approximately 2,088 tons.¹¹⁹ Construction of the Project buildings is estimated to generate a total of approximately 209 tons of solid waste.¹²⁰ This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As required by City Ordinance No. 181519, the construction and demolition waste would be delivered to City certified construction and demolition waste processors where it would be recycled as feasible. Moreover, the *Countywide Integrated Management Plan 2017 Annual Report* concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.¹²¹ Therefore, the Project-generated demolition debris of 2,088 tons and construction waste of 209 tons would represent a very small percentage of the inert waste disposal capacity in the region.

The Project would generate solid waste that is typical of a residential use and be consistent with all Federal, State, and local statutes and regulations regarding proper disposal. As shown in Table V-24, Project Estimated Daily Solid Waste Generation, the Project would generate approximately 1,199 pounds per day of net solid waste.

Table V-24
Project Estimated Daily Solid Waste Generation

Land Use	Size	Generation Rate ^a (pounds/day)	Total Generation (pounds/day)
Residential	98 du	12.23/du	1,199
Total Estimated Solid Waste Generation			1,199
<i>Notes: du = dwelling unit</i>			
^a <i>Generation rates are from the L.A. CEQA Thresholds Guide, 2006 (residential rate used).</i>			
<i>Source (table): EcoTierra Consulting, 2019.</i>			

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. All

¹¹⁹ 2,400 square feet of asphalt multiplied by 12 inches assumed depth is 28,800 cubic feet or 1,067 cubic yards. Asphalt is estimated to be 3,915 pounds per cubic yard, multiplied by 1,067 is 4,177,305 pounds (2,088 tons).

¹²⁰ A construction waste generation rate of 4.98 pounds per square foot for residential construction was used. 95,382 square feet of residential construction multiplied by 4.39 pounds is 418,727 pounds (209 tons). Source: USEPA Report No. EPA A530-98-010, *Characterization of building Related Construction and Debris in the United States*, July 1998.

¹²¹ County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2017 Annual Report*, April 2019, Appendix E-2, Table 1.

solid waste-generating activities within the City, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is assumed that the Project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills. Nonetheless, it is conservatively assumed that all 1,199 pounds per day of the Project's solid waste would be disposed of at regional landfills. The average daily intake of the Sunshine Canyon Landfill is approximately 7,582 tons and the permitted daily intake is 12,100 tons per day.¹²² According to the *2014 Annual Report*, the Sunshine Canyon Landfill had approximately 64.7 million tons of remaining capacity.¹²³ As such, the landfill's permitted daily intake of 12,100 tons per day would accommodate the net daily operational waste generated by the Project of 1,199 pounds per day. Therefore, the Project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant and no mitigation measures would be required.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated onsite by the project would be disposed of in accordance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939.

Consistency with California Integrated Waste Management Act of 1989

The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the Project's net total solid waste generated (1,199 pounds per day) must be recycled rather than disposed of in a landfill. The Project would be required to comply with AB 939 requirements and approximately 50 percent of the Project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. The Project would also be required to comply with the Bureau of Sanitation Solid Resources Infrastructure Facility Plan to reduce the amount of solid waste being disposed into landfills by promoting diversion techniques that increase recycling of solid waste, consistent with AB 939. Therefore, the Project would not substantially increase solid waste generation in the City or the amount disposed into the landfills, and the Project would be consistent with AB 939.

Consistency with the City of Los Angeles General Plan Framework Element

The Framework Element of the City of Los Angeles General Plan also supports AB 939 and its goals by encouraging "an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal."¹²⁴ The

¹²² *California Integrated Waste Management Board, Solid Waste Information System, Facility/Site Summary Details*, website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000>, accessed June 2019.

¹²³ *California Integrated Waste Management Board, Solid Waste Information System, Facility/Site Summary Details*, website: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AA-2000>, accessed June 2019.

¹²⁴ *Los Angeles Department of City Planning, Citywide General Plan Framework, 1996, page 9-11.*

Project would implement strategies to create minimal waste and utilize recycled materials, which in turn would reduce the number of refuse haul trips. The Project would include enclosed trash areas and recycling storage areas and divert 50 percent of the construction waste debris away from landfills. The Project would be consistent with the City of Los Angeles General Plan Framework goal of maximizing source reduction and materials recovery, and minimizing the amount of waste requiring disposal. Therefore, the Project would be consistent with the Framework Element.

Los Angeles Municipal Code

The LAMC requires a project to be designed to incorporate a recycling area or room.¹²⁵ The Project would be required to comply with this requirement and have sufficient containers to accommodate the amount of solid waste and recycling generated by the premises. Therefore, the Project would be consistent with the LAMC.

Based on the above, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Accordingly, impacts would be less than significant and no mitigation measures would be required.

Cumulative Impacts

Water

Implementation of the Project, along with other projects within the service area of LADWP, would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan has been taken into account in the adopted 2015 UWMP. The 2015 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2040 (the planning horizon required of 2015 UWMPs) under wet and dry year scenarios. It is unknown whether or not other development in the LADWP service area has been taken into account in the 2015 UWMP. Nonetheless, it can be assumed that any related projects that are not included in the 2015 UWMP would be required to identify water supplies prior to project approval. In addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (pursuant to SB 610) to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, the cumulative impact would be less than significant.

With respect to water infrastructure, the potential need for the related projects to upgrade water lines to accommodate their water needs is site-specific and there is little, if any, cumulative relationship between the development of the Project and the related projects. As discussed above, the Project would have a less than significant impact on water infrastructure. Any upgrades to the related projects' water infrastructure would be required to be implemented by the applicants for those projects, and would be conducted in accordance with all applicable regulatory requirements. Therefore, the cumulative impact would be less than significant.

125 Los Angeles Municipal Code, Section 12.21.A.19.c.

Wastewater

Implementation of the Project in combination with other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP has an average daily flow of 275 mgd in dry weather, which can double in wet weather; however, the HTP has capacity to treat a maximum daily flow of 450 mgd and peak wet weather flow of 800 mgd. This equals a typical remaining capacity of 175 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (0.012 mgd) and, as such, the Project's demand would not be cumulatively considerable.

With respect to wastewater infrastructure in the City, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants for each of the related projects will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant.

Solid Waste

Implementation of the Project in combination with other projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and related projects generate Construction and Demolition (C&D) waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor, it is anticipated that future cumulative development within the City would also implement similar measures to divert C&D waste from landfills. Moreover, the *Countywide Integrated Management Plan 2017 Annual Report* concludes that there is current capacity of 55.71 million tons available throughout the County for the disposal of inert waste.¹²⁶ Therefore, the Project-generated demolition debris of 2,088 tons and construction waste of 209 tons would represent a very small percentage of the inert waste disposal capacity in the region. Therefore, cumulative impacts from C&D waste would be less than significant.

¹²⁶ *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2017 Annual Report, April 2019, Appendix E-2, Table 1.*

Operation of the Project in conjunction with other projects within the Southern California region that are serviced by area landfills would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2016 Annual Report (published September 2017) projects waste generation and available landfill capacity through 2031. Based on the 2016 Annual Report, Los Angeles County has the projected disposal capacity through 2031.¹²⁷ The Project's estimated net increase in operational solid waste generation, in conjunction with the related projects, would represent an insignificant portion of the estimated approximately 29.7 million tons that is anticipated to be generated in 2022 (Project build-out year).¹²⁸ Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste being landfilled for the related projects. Therefore, cumulative impacts from operational solid waste would be less than significant.

¹²⁷ Los Angeles County Department of Public Works, *Countywide Integrated Waste Management Plan, 2016 Annual Report*, published September 2017, website: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>, accessed: February 2019.

¹²⁸ County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2017 Annual Report*, April 2019, Appendix E-2 Table 5.

20. Wildfire

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

a) Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

The State Responsibility Area (SRA) is the area in the State where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA is comprised of over 31 million acres across the entire State to which the State Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services. Lands in the SRA are based on vegetative cover and natural resource values. As a result of the Oakland Hills Fire of 1991, AB 337 was passed in 1992 requiring CAL FIRE to work with local governments to identify high fire hazard severity zones within local responsibility areas throughout each county in the State. In response, the City first established the Very High Fire Hazard Severity Zone (VHFHSZ) in 1999. The VHFHSZ replaced the older "Mountain Fire District" and "Buffer Zone." The VHFHSZ comprises most of the hilly and mountainous regions of the City.

The Project Site is located in a developed, urban area in the Community Plan area. The Project Site and surrounding area are relatively flat and do not contain any significant slope. The Project Site is not located in or near the State responsibility area; the nearest part of the State responsibility area is located approximately 8.3 miles to the northwest in Topanga State Park.¹²⁹ Additionally, the Project Site is not located in a very high fire hazard severity zone; the nearest very high fire severity zone is located approximately 1.2 miles to the south in the Ballona Wetlands Ecological Reserve.¹³⁰ None of the roadways that run adjacent to the Project Site (Thatcher Avenue, Princeton Drive, or Oxford Avenue) are identified as a disaster route by either the City,¹³¹ or by Los Angeles County.¹³² Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is a County- and City-designated disaster route.¹³³

As detailed in Question 9.f) above, although the Project Site is located near County- and City-designated disaster routes, neither construction nor operation of the Project would impair or physically interfere with an adopted emergency response plan. Access for emergency service providers and evacuation routes would be maintained during construction and operation of the Project would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way. Furthermore, as discussed above under Section 17, Transportation, the Project would not result in any significant traffic impacts. An emergency response plan would be submitted to Los Angeles Fire Department during review of plans as part of the standard building permit process. Accordingly, the Project would have a less than significant impact on adopted emergency response plans or emergency evacuation plans as they pertain to State responsibility areas or very high fire hazard severity zones and no mitigation measures would be required.

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

No Impact. A significant impact may occur if a project were to expose people to pollutant concentrations from a wildfire or in the path of an uncontrolled spread of a wildfire.

As detailed above, the Project Site is not located in or near the State responsibility area or a very high fire hazard severity area. Although the Project Site is located downslope of the identified State responsibility area and very high fire severity zone of Topanga State Park, the Project Site is more than 7 miles away from that zone. Therefore, the Project would not have the potential to

¹²⁹ California Board of Forestry and Fire Protection, *State Responsibility Area Viewer*, available at: <http://www.fire.ca.gov/firepreventionfee/srviewer>, accessed April 2019.

¹³⁰ City of Los Angeles Fire Department, *Fire Zone Map Viewer*, available at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>, accessed April 2019.

¹³¹ City of Los Angeles Fire Department, *Fire Zone Map Viewer*, available at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>, accessed April 2019.

¹³² Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map*, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019.

¹³³ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Culver City map*, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996*.

expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Accordingly, the Project would have no impact with regard to pollutant concentrations or uncontrolled spread of wildfire as it pertains to State responsibility areas or very high fire hazard severity zones and no mitigation measures would be required.

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

No Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.

As detailed above, the Project Site is not located in or near the State responsibility area or a very high fire hazard severity area. As such, the Project would not require the installation or maintenance of associated infrastructure. Accordingly, the Project would have no impact with regard to the installation and maintenance of infrastructure as it pertains to State responsibility areas or very high fire hazard severity zones and no mitigation measures would be required.

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

No Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

As detailed above, the Project Site is not located in or near the State responsibility area or a very high fire hazard severity area. In addition, as detailed in Section 10, Hydrology and Water Quality, the Project would not significantly alter drainage patterns compared to existing conditions. The Project would not modify the surrounding streets with respect to the manner in which they convey runoff to the City storm drain system. Therefore, the Project would not have the potential to expose people or structures to downslope or downstream flooding or landslides. Accordingly, the Project would have no impact with regard to flooding or landslides as a result of runoff, post-fire slope instability, or drainage change within State responsibility areas or very high fire hazard severity zones and no mitigation measures would be required.

Cumulative Impacts

As discussed above, the Project would result in a less than significant impact on wildfire. Lincoln Boulevard, approximately 1,000 feet east of the Project Site, is a County- and City-designated disaster route.¹³⁴ As detailed in Question 9.f) above, although the Project Site is located near

¹³⁴ *Los Angeles County Department of Public Works, Disaster Route Maps, City of Culver City map, website: <https://dpw.lacounty.gov/dsg/DisasterRoutes/map/culver%20city.pdf>, accessed: April 2019; and City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles, Adopted November 1996.*

County- and City-designated disaster routes, neither construction nor operation of the Project would impair or physically interfere with Lincoln Boulevard. Moreover, the Project is located within a highly developed area of the City that does not include wildlands or high fire hazard terrain or vegetation. The Project would comply with all development regulations, and compliance with all building code, development regulations, and utility providers' requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant. Likewise, other development projects in the Project vicinity would also be located in a highly developed area in the City and subject to similar development regulations. The Project would not have a considerable contribution to a potential cumulative impact on wildfire, and cumulative impacts would be less than significant.

21. Mandatory Findings of Significance

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

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

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues.

The Project is located in an urbanized area and would have no significant and unavoidable impacts with respect to biological resources or cultural resources. The Project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts would be less than significant and no mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the project site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together.

As concluded throughout this checklist, the cumulative impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities and service systems would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections.

The analysis contained in this checklist concludes that the Project would not result in significant and unavoidable adverse effects. Therefore, impacts would be less than significant and no additional mitigation measures are required.