APPROVED

JUN 21 2017

BOARD OF RECREATION
AND PARK COMMISSIONERS

BOARD REPORT NO. 17-152

DATE June 21, 2017 C.D. 10

BOARD OF RECREATION AND PARK COMMISSIONERS

SUBJECT: LAFAYETTE PARK – PROPOSED ARTS AND RECREATION CENTER – LEASE AGREEMENT WITH HEART OF LOS ANGELES ARTS COMMUNITY PARTNERS FOR THE CONSTRUCTION AND OPERATION OF AN ARTS AND RECREATION CENTER, FINAL CONSTRUCTION PLANS – NEGATIVE DECLARATION AND RELATED FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

AP Diaz		V. Israel	
for R. Barajas	CBD	N. Williams	
H. Fujita			

General Manager

Approved ✓ Disapproved _____ Withdrawn _____

As Amended

RECOMMENDATIONS

1. Adopt a proposed Resolution, herein included as Attachment 1, authorizing the Department of Recreation and Parks (RAP) to enter into a fifty (50) year Lease (Lease) with Heart of Los Angeles Community Partners (HOLA) for the construction and operation of a proposed Arts and Recreation Center (Center) at Lafayette Park and a Consent to Leasehold Deed of Trust and Modification of Lease (Consent to Leasehold) with HOLA and New Markets Community Capital XXI, LLC, a Delaware limited liability company (LENDER), in order to obtain financing secured by HOLA's leasehold interest in the proposed Project site under the New Markets Tax Credit (NMTC) program in accordance with Charter Section 594(a) and 595;

2. Authorize RAP to negotiate the Lease with HOLA for the construction and operation of the proposed Center at Lafayette Park in accordance with Charter Sections 594(a) and 595 and consistent with the terms, improvements, and uses set forth in this Report;

3. Authorize RAP to negotiate the Lender Consent with HOLA and LENDER, in order to obtain financing secured by HOLA's leasehold interest in the proposed Project site under the New Markets Tax Credit (NMTC) program in accordance with Charter Section 594(a) and 595 and consistent with the terms and uses set forth in this Report:

4. Authorize RAP to review and approve a fifty (50) year Sub-Lease Agreement (Sublease) between HOLA and Heart of Los Angeles-Youth (HEART OF LA) that will effectuate the subletting of the proposed Center at Lafayette Park in order to allow HOLA to obtain NMTC financing under Internal Revenue Code Section 45 in accordance with Charter Section 594(a) and 595 and consistent with the terms and uses set forth in this Report;

5. Authorize RAP and the City Attorney to make any necessary changes to the Lease, Consent to Leasehold, and Sub-Lease consistent with the terms, improvements, and uses set forth in this Report:

6. Authorize the Board President and Secretary to execute the proposed Lease and Consent to Leasehold, upon receipt of the necessary approvals;

7. Request that the City Council consent to HOLA entering into a proposed Sublease with HEART OF LA to effectuate the subletting of the improvements in order to allow HOLA to obtain NMTC financing under Internal Revenue Code Section 45;

8. Approve the final construction plans of the proposed Center as described in the Summary of this Report~~;~~, with the exception that a final plan for exterior landscaping shall be returned to the Board for additional approval;

9. Authorize, upon approval of the construction plans and execution of Lease, Consent to Leasehold, and Sublease, the issuance of a temporary Right-of-Entry Permit to HOLA and/or HEART OF LA for the proposed construction area depicted in Exhibit E to allow for the construction of the proposed Center;

10. Review, consider and adopt the Initial Study (IS) and Negative Declaration (ND) for the Lafayette Park – Heart of Los Angeles Art and Recreation Center, finding that on the basis of the whole record of proceedings of the Project, including the IS/ND and any public and/or agency comments received therefrom, that there is no substantial evidence that the Project will have a significant effect on the environment, and that all potentially significant environmental effects of the Project have been properly disclosed and evaluated in the IS/ND in compliance with the California Environmental Quality Act (CEQA) and the State and City CEQA Guidelines, and that the IS/ND reflects the Board's independent judgment and analysis;

11. Direct RAP staff to file a Notice of Determination (NOD) for the adopted IS/MND with the Los Angeles City Clerk and the Los Angeles County Registrar/Recorder within five days of final approval by the City Council; and,

12. Authorize the RAP Chief Accounting Employee to prepare a check to the Los Angeles County Clerk in the amount of Seventy-Five Dollars ($75.00) for the purpose of filing a NOD.

SUMMARY

Lafayette Park is a 9.72-acre park located at 625 South Lafayette Park Place, Los Angeles (see Exhibit A). The facility contains a multi-purpose building with an auditorium and various community rooms, basketball courts, a children's play area, picnic tables, a lighted soccer field and several lighted tennis courts. It offers aerobics, day care, preschool and after school programs, and summer camps, among other things. The Park serves approximately 32,020 people within a half-mile walking radius.

Background

In 2007, Heart of Los Angeles Youth, Inc., (HEART OF LA) contributed more than Seven Hundred Thousand Dollars ($700,000) for the completion of the Lafayette Park (Park) Multi-purpose Building and the enhancement of youth recreational programs at the Park. Since the completion of the multi-purpose building, HEART OF LA, in partnership with RAP, has provided various athletic, arts, enrichment and camp programs to more than two thousand (2,000) families. Some of the activities that HEART OF LA has provided include basketball and soccer leagues and clinics; summer camps; homework clubs, limited enrichment classes, karate and beginning ballet classes, and a quarterly Science, Technology, Engineering, and Mathematics (STEM) class. These activities are offered year round. Additionally, through a coordinated effort with RAP staff, monthly meetings are held with neighborhood stakeholders, Law Enforcement, Park Rangers, and Council Office staff that coordinate safety measures and services with the intent to keep the Park active with supervised activities that include neighborhood safety plans and drills.

Due to the success of the programs provided and the fact that the neighborhood where the Park is located is composed of largely low income families, the RAP/HEART OF LA programs fill up quickly with most filling up on the same day enrollment begins. There are, on average, waiting lists of up to three hundred (300) families and as many as five hundred (500) children waiting to access the programs, especially for afterschool activities when most juvenile crime occurs.

In order to meet the demand, HEART OF LA submitted a proposal in early 2015 to expand the HEART OF LA program through the construction of a new arts and recreation center (Center) on a portion of the Park. The proposed building would be modular, built from single-use shipping containers that have been converted by a local manufacturer to custom designed club rooms, activity rooms, walkways, offices, common areas, and bathrooms. On August 12, 2015, the Board of Recreation and Park Commissioners (Board), after consideration by the Board's Facility Repair and Maintenance Task Force, approved the conceptual plan to expand the HEART OF LA program at the Park (Report No. 15-189).

Prior to the Board's approval of the conceptual plan, HEART OF LA attended two MacArthur Park Neighborhood Council Meetings to present the proposed Project. These meetings occurred on June 15, 2015 and July 20, 2015. Additionally, HEART OF LA presented the Project to the Rampart Neighborhood Village Council on July 21, 2015, which granted its unanimous approval at a second meeting held on October 25, 2015. It should be noted that letters of support for the Project were received from Council President Herb Wesson, Jr. and LAPD Chief Charlie Beck.

Proposed Arts and Recreation Center

The proposed Center is to measure approximately 24,860 square feet and have a height of no more than 41 feet, 6 inches at its highest point. The new building will be a modular, sustainable design, built from single-use shipping containers that have been recycled and converted into custom-designed club rooms, activity rooms, walkways, offices, common areas, and bathrooms. It will be visually compatible with the existing multi-purpose building/recreation center, with exterior facades softened by student art, rooftop green spaces and patios, and various landscaping elements. The building's proposed floor plan is made up of three levels, which will include music and enrichment program rooms, practice rooms, and two smaller ensemble rooms. The building is designed to fit in with the natural slope of the Park, as such, only two stories are visible from La Fayette Park Place. However, the heart of the building will be its large ensemble room and performance space, a west-facing two-story room that will open out onto the Park for public performances of music, theater, and other community events (see Exhibit B).

The Project would increase Heart OF LA's capacity to provide services and allow HEART OF LA to serve over 4,000 members of the community annually by 2020. This building will house programming that will complement the other programs that HEART OF LA and RAP conduct in the Park. Further, HEART OF LA will move its entire music program into the building. The music program consists of youth leadership classes, big bands and rock bands, and orchestral instruction for youth aged six to eighteen (6-18) years, including HEART OF LA much-lauded program with LA Philharmonic Orchestra.

Existing Site Conditions

As indicated on Exhibit A and B, the Project is to be constructed on an approximately 23,544 square feet portion of the north side of the Park just south of 6th Street. This area currently contains picnic tables and a number of trees as can be seen in the pictures shown on Exhibit C. It is expected that we will lose approximately eighteen (18) palm trees and five canopy trees (two Jacaranda, one Large Chorisia, one Ash, and one Tipuana) as shown on Exhibit D-1. These trees are found in and around the picnic area that will require approximately ten picnic tables to be relocated. A new picnic area will be placed near and under a large mature ficus tree near the soccer field. The picnic area that remains will receive twenty-eight (28) new trees that will replace the shade canopy lost by construction of the building as shown on Exhibit D-2. Although the Park will be losing open space in this portion of the Park, RAP staff recommends that the public benefit of being able to reach out and provide services to twice as many members of the community, and the requisite increase in the activity within the Park outweigh the loss of open space.

In addition, RAP supported the location of this new facility inside the Park mainly due to the types of programs being offered and the added activation to the Park. The new facility is expected to double the number of families with children in the Park, and as a result of this significant activation, RAP staff believes will add to the safety and opportunities of more families patronizing the Park.

Tree Replacement

As indicated above, it is expected that the Park will lose approximately twenty-three (23) trees. A tree canopy analysis was completed and recommended the following replacement plan:

No. & Type of Trees Removed	No. of Trees Recommended	Proposed Tree Box Size for Canopy Replacement
2 Large Jacarandas	4	72" Box Trees
1 Large Chorisia	2	72" Box Trees
1 Ash	2	60" Box Trees
1 Tipuana	1	36" Box Trees
0	6	48" Box Trees
	9	36" Box Trees
	4	24" Box Trees
Total Replacement Trees	28	

This plan provides a 2:1 replacement of mature canopy trees with mature trees available in nurseries. Three mature canopy trees (two Jacaranda and one Chorisia) will be replaced with six 72" box canopy shade trees. Final species types will be determined in consultation with RAP staff and input from the "Tree Cabinet" Considerations will include nursery availability to provide moderate to fast growing canopy trees that are available in large, healthy condition at nurseries at the time of procurement. Possible species include Tipuana Tipu, Podocarpus or other species resistant to known pests and diseases.

Funding Sources

HEART OF LA has proposed an approximately Twelve Million Dollars ($12,000,000.00) budget, of which approximately Six Million Dollars ($6,000,000.00) will be spent on the Center. This amount is inclusive of contingencies and subject to reductions if cost savings are identified through value engineering, in-kind donations, or other means. Funds for the Center come from the following sources: (1) Capital Campaign Donations received from individual and institutional donors in the amount of Two Million, Nine Hundred Thousand Dollars ($2,900,000.00); (2) Bridge Loan funds from U.S. Bank in the amount of about Three Million, Six Hundred Thousand Dollars ($3,600,000.00) to Four Million, Six Hundred Thousand Dollars ($4,600,000.00); (3) City of Los Angeles Proposition K grant funds in the amount of about One Million, Three Hundred Sixty Thousand Dollars ($1,360,000.00); (4) financing through the New Markets Tax Credit (NMTC) program in the amount of approximately Three Million, Six Hundred Thousand Dollars ($3,600,000.00) to Three Million, Nine Hundred Thousand Dollars ($3,900,000.00), subject to pending finalization of the Lender's financial model and minor adjustments being made to the overall Project budget.

The Bridge Loan described in Item (2) is a short-term loan to provide up-front funds in the amount of pledges from donors that have not yet been funded, including payments over time. As donor funds are received, they will be used to reduce the balance of the bridge loan until fully repaid.

The NMTC program referenced in Item (4) is administered by the United States Treasury Department, through its Community Development Financial Institutions (CDFI) Fund that offers funding resources to economically disadvantaged communities. Under the NMTC program, HEART OF LA can use a combination of funds already raised and NMTC investor equity to raise approximately twenty percent to twenty-five percent (20%-25%) more capital for the Project. US Bank Community Development Corporation (USBCDC), a national NMTC investor, and New Markets Community Capital (Lender), a certified community development entity, will provide NMTC financing for the Center. Lender will make a long-term, low interest rate loan to a newly formed affiliate of HEART OF LA, Heart of Los Angeles Community Partners (HOLA), a special purpose entity that will meet the requirements for a qualified borrower under the NMTC program.

HOLA will enter into a Lease and develop the Center. When the Center is complete, HOLA will sublease the building to HEART OF LA, who has the operational and programmatic capacity to fulfill all of the non-monetary obligations under the Lease.

Various Agreements

Lease

As described above, a portion of the funding for the development of the Center will come from Lender. And as required, HEART OF LA has formed an affiliate called HOLA which is a special purpose entity that meets the requirements for a qualified borrower under the NMTC program. HOLA will be the lessee of the Lease. This leasehold interest will be used to secure the funding being applied for.

The Lease will include the following terms and conditions:

1. Premises area measures approximately 23,554 square feet as depicted in Exhibit E.

2. Lessee shall construct a new three-story Arts and Recreation Center that measures approximately 24,860 square feet with a height of no more than 41 feet, 6 inches at its highest point.

3. Term shall be fifty (50) years from the effective date of the Lease.

4. Lessee agrees to secure necessary funding for the construction of the Project within twelve (12) months following the execution date of the Lease. Failure to secure the necessary funding shall be grounds for automatic termination of the Lease unless extended in writing by the City.

5. Rent shall be the consideration of all costs for the construction, operation, and maintenance of the Center.

6. Lessee shall comply with all legal requirements applicable to the property for use, operation or occupation of the Center. Lessee shall maintain the Center at its sole cost and expense.

Sublease

All operational and maintenance responsibilities will performed by HEART OF LA. These responsibilities will be passed to HEART OF LA through the Sublease. The Sublease will essentially contain the same terms and conditions that are in the Lease.

Consent to Leasehold Deed of Trust and Modification of Lease

As already discussed, a portion of the Center funding will come from NMTC and in order to qualify for said funding, the leasehold interest on the project site will be used to secure the financing being sought. The Consent to Leasehold Deed of Trust and Modification of Lease (Consent to Leasehold) is intended as an acknowledgement from RAP that it consents to use of the leasehold interest for financing purposes and that in the event HOLA can no longer fulfill the requirements of the Lease, Lender will be allowed to take HOLA's place or find a qualified replacement entity.

ENVIRONMENTAL IMPACT STATEMENT

In accordance with the requirements of CEQA, a Negative Declaration (ND) was prepared based on an Initial Study (IS), which determined that project had no significant environmental effects. The IS/ND was circulated to all interested parties and responsible agencies for a 20-day review and comment period from May 4, 2017 to May 23, 2017. The final IS/ND incorporates two comment letters concerning potential environmental effects submitted during the public comment period, copies of which have been provided to the Board for its review and consideration. However, the comments did not require any additional environmental analyses or substantive changes to the IS/ND. Therefore, Staff recommends that the Board adopt of the IS/ND subject to final approval of the project by City Council. RAP Staff will file a Notice of Determination (NOD) with the Los Angeles County Clerk upon final project approval.

FISCAL IMPACT STATEMENT

There is no impact to RAP's General Fund. All costs associated with the design, construction, and maintenance of the Project will be the responsibility of HOLA-CP and/or HOLA-Youth.

This Report was prepared by Cid Macaraeg, Sr. Management Analyst II in Real Estate and Asset Management, Planning, Maintenance, and Construction Branch.

LIST OF ATTACHMENTS/EXHIBITS

1) Proposed Resolution
2) Exhibit A: Lafayette Park – Existing Site Conditions Aerial Photo
3) Exhibit B: Site Rendering in Park Context
4) Exhibit C: Existing Site at Various Angles
5) Exhibit D-1: Existing Tree Diagram
6) Exhibit D-2: Proposed Tree Diagram
7) Exhibit E: Lease Line Exhibit
8) Initial Study (IS) and Negative Declaration

ATTACHMENT 1

RESOLUTION NO. _____

WHEREAS, the City of Los Angeles (CITY) owns and controls certain lands, known as Lafayette Park identified by Assessor's Parcel Nos. 5077-06-900 and 901, under the management and control of the Board of Recreation and Parks Commissioners (BOARD); and

WHEREAS, HOLA Community Partners (HOLA) is a non-profit public benefit corporation formed for the purpose of providing underprivileged youth with free, exceptional programs in academics, arts and athletics; performs the charitable functions of and carries out the charitable purposes of Heath of Los Angeles Youth, Inc., a California non-profit public benefit corporation (HEART OF LA); and is a supporting organization controlled by Heart of LA, as specified in Section 509(a)(3) of the Internal Revenue Code (the Code); and

WHEREAS, HOLA has special abilities in the areas of fundraising, enrichment, recreation programs, and community outreach for at-risk youth, and desires to construct, operate, and maintain an arts and recreation center that emphasizes community enrichment, recreation programs and activities for the inner-city youth of Los Angeles (Center); and

WHEREAS, in 2007, Heart of LA contributed more than Seven Hundred Thousand Dollars ($700,000) for the completion of the Lafayette Park Multi-purpose Building and the enhancement of youth recreational programs at the park;

WHEREAS, since the completion of the multi-purpose building, HOLA, in partnership with the Department of Recreation and Parks, has provided various athletic, art, enrichment and camp programs to more than 2,000 families including basketball and soccer leagues and clinics; summer camps; homework clubs, limited enrichment classes, karate and beginning ballet classes, and a quarterly Science, Technology, Engineering, and Mathematics (STEM) class;

WHEREAS, CITY and HOLA desire to enter into a fifty (50) year Lease Agreement (Lease) for use of certain land within Lafayette Park (Exhibit A), which Lease shall set forth the duties, obligations, responsibilities, aims, and goals of the parties, for the specific purpose of constructing , operating, and maintaining the Center ; and

WHEREAS, New Markets Community Capital XXI, LLC (LENDER) is a certified community development entity under the New Market Tax Credit Program that is administered by the United States Treasury Department through its Community Development Financial Institutions Fund that offers funding resources to economically disadvantaged communities; and

WHEREAS, LENDER has committed to HOLA to make certain loans to HOLA upon certain terms and conditions for the construction, operation, and maintenance of the Center; and

WHEREAS, CITY, HOLA and LENDER desire to execute a Consent to Leasehold Deed of Trust and Modification of Lease (Consent to Leasehold) in order for HOLA to secure needed loans from LENDER for the construction, operation, and maintenance of the Center ; and

WHEREAS, CITY and HOLA agree that upon the completion of the Center, HEART OF LA, through a Sublease Agreement (Sublease) between HOLA and HEART OF LA, will operate and maintain the Center as required by the terms and conditions of the Lease;

NOW, THEREFORE, BE IT RESOLVED, that the Board of Recreation and Park Commissioners approves the proposed Lease between the CITY and HOLA for the use of certain land within Lafayette Park for the specific purpose of constructing, operating and maintain the Center; and,

BE IT FURTHER RESOLVED, that the Board of Recreation and Park Commissioners approves the proposed Consent to Leasehold between the CITY, HOLA, and LENDER to secure needed loans for the construction, operation and maintenance of the Center; and,

BE IT FURTHER RESOLVED, that the Board of Recreation and Parks Commissioners approves the proposed Sublease Agreement between HOLA and HEART OF LA for the operation and maintenance of the Center as required by the terms and conditions of the Lease; and,

BE IT FURTHER RESOLVED, that the City Attorney's Office shall be authorized to make material and technical changes as needed to the proposed Lease, Consent to Leasehold, and Sublease, so long as consistent with the terms and uses described in Board Report No. _____.

I HEREBY CERTIFY that the foregoing is a full, true and correct copy of a Resolution adopted by the Board of Recreation and Park Commissioners of the City of Los Angeles at its Meeting held on _____, 20__ (Report No. _____)

_____
ARMANDO X. BENCOMO, BOARD SECRETARY

Resolution No. _____

Heart of Los Angeles Performing Arts and Enrichment Center
625 S. La Fayette Park Place, Los Angeles, Ca.

Existing Site Conditions Aerial Photo
March 8, 2017
Berliner Architects
Office of the Designed Landscape

Exhibit A

Heart of Los Angeles Performing Arts and Enrichment Center
625 S. La Fayette Park Place, Los Angeles, Ca.

Site Rendering in Park Context
March 8, 2017
Berliner Architects
Office of the Designed Landscape

Exhibit B

Existing Site Looking North towards 6th Street

Existing Site Looking West near 6th Street

Existing Site Looking West from Parking Lot

Existing Site Looking North towards 6th Street

Heart of Los Angeles Performing Arts and Enrichment Center
625 S. La Fayette Park Place, Los Angeles, Ca.

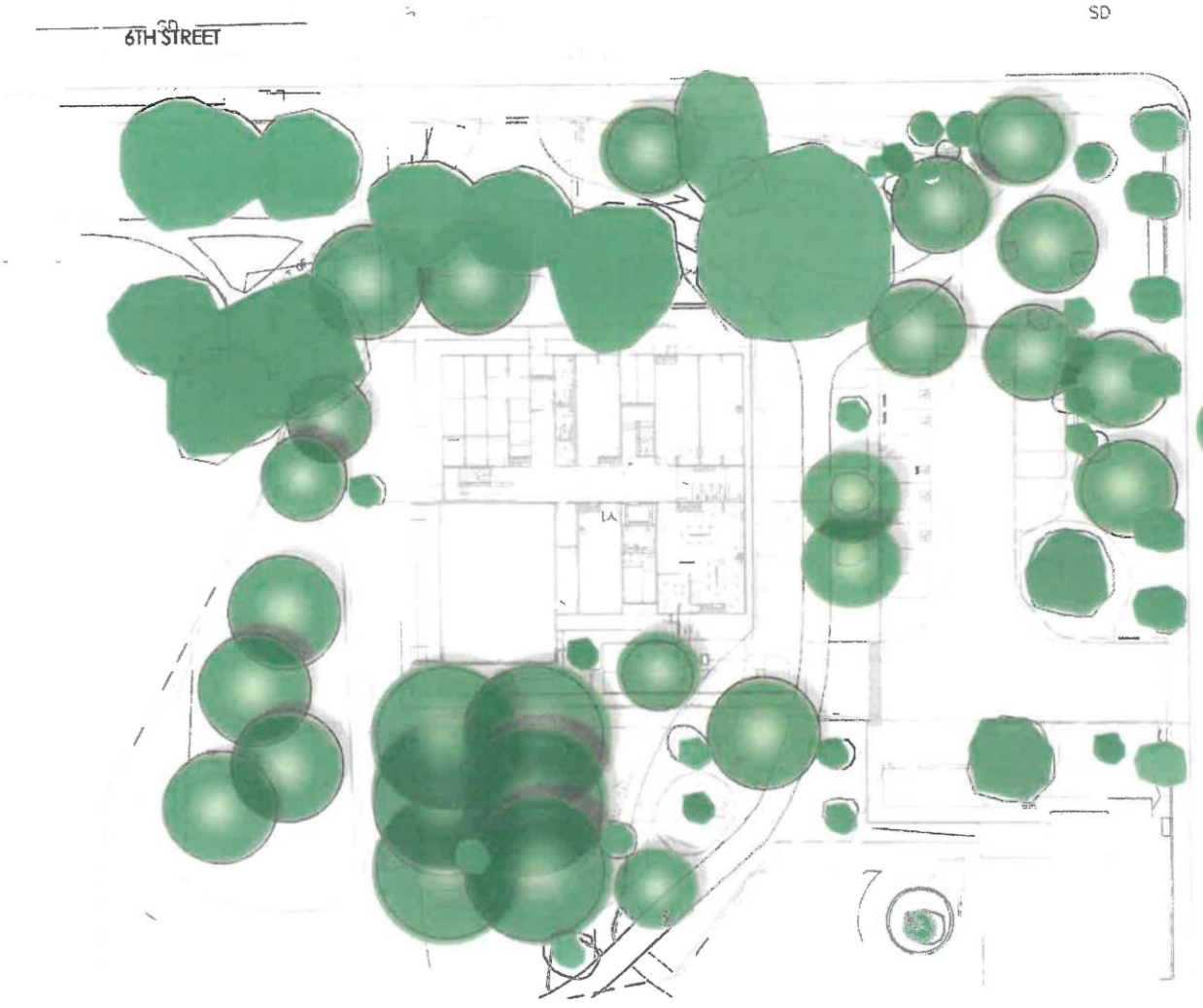
March 8, 2017
Berliner Architects
Office of the Designed Landscape

Exhibit C

Heart of Los Angeles Performing Arts and Enrichment Center
625 S. La Fayette Park Place, Los Angeles, Ca.

Existing Tree Diagram
March 8, 2017
Berliner Architects
Office of the Designed Landscape

Exhibit D-1



Proposed Trees

10 Trees to replace 5 Canopy Trees
18 Trees to replace 18 Palm Trees
28 Total Trees to be planted
1 Tree to be transplanted

Proposed Tree

Existing Tree

Heart of Los Angeles Performing Arts and Enrichment Center
625 S. La Fayette Park Place, Los Angeles, Ca.

Proposed Tree Diagram

March 8, 2017
Berliner Architects
Office of the Designed Landscape

Exhibit D-2

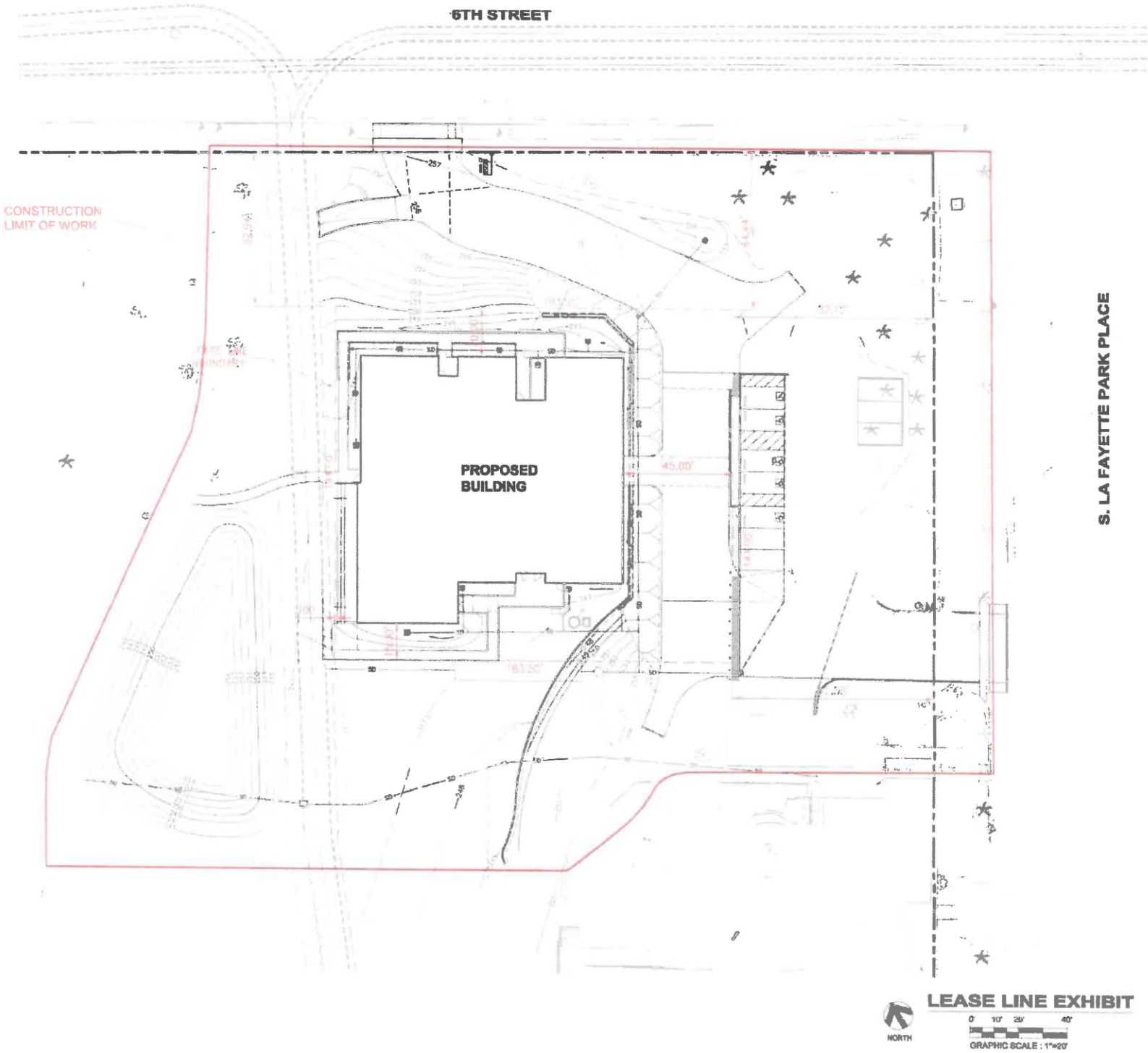

6TH STREET
CONSTRUCTION
LIMIT OF WORK
PROPOSED
BUILDING
45.00'
S. LA FAYETTE PARK PLACE
NORTH
LEASE LINE EXHIBIT
0' 10' 20' 40'
GRAPHIC SCALE : 1"=20'

Exhibit E

ATTACHMENT 8

CITY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 360, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NEGATIVE DECLARATION

(Article I, City CEQA Guidelines)

FORM RP 7-31-15

LEAD CITY AGENCY AND ADDRESS: Department of Recreation and Parks, 221 N. Figueroa Street, Suite 400, Los Angeles, CA 90012	**COUNCIL DISTRICT:**
PROJECT TITLE: **LAFAYETTE PARK — HOLA Arts and Recreation Center**	**CASE NUMBER:**

PROJECT LOCATION: 625 S. La Fayette Park Pl, Los Angeles, CA 90057

PROJECT DESCRIPTION:
The Los Angeles Department of Recreation and Parks (LADRP) and Heart of Los Angeles (HOLA) propose to add a new 24,860 square-foot modular building to the existing park that would house the HOLA Arts and Recreation Center. HOLA is a partnership organization that provides extracurricular activities in academics, arts, and athletics to underserved youth in Los Angeles. The proposed Arts and Recreation Center would provide three levels of space for activities including large and small ensemble rooms for music practice and performance, club rooms for academic and art use, offices, reception area and lobby, and roof deck. The project is also seeking a lease agreement between HOLA Community Partners and LADRP for construction and operation of the proposed Arts and Recreation Center.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

FINDING: The Department of Recreation and Parks of the City of Los Angeles has determined that this project will not have significant effect on the environment for the following reasons: **SEE ATTACHED INITIAL STUDY**

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

Any written objections received during the public review period are attached together with the response of the lead City Agency.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED

NAME OF PERSON PREPARING THIS FORM:	ADDRESS:	TELEPHONE NUMBER:
Paul Davis Environmental Supervisor II	221 N. Figueroa St., Suite 400 Los Angeles, CA 90012	(213) 202-2667
SIGNATURE (OFFICIAL): Paul J. Davis		DATE: 4/17/17

FINAL INITIAL STUDY / NEGATIVE DECLARATION

Date:	April 2017
Project Title:	Heart of Los Angeles Arts and Recreation Center
Lead Agency Name & Address:	City of Los Angeles Department of Recreation and Parks 221 N Figueroa Street Suite 350 Los Angeles, CA 90012 (213) 202-2700
Project Applicant Name & Address:	HOLA Community Partners 2701 Wilshire Boulevard, Suite 100 Los Angeles, CA 90057
Project Location:	615-625 S. La Fayette Park Place Los Angeles, CA 90057
APN(s):	5077-006-900
General Plan Designation:	Open Space
Zoning:	OS-1XL (Open Space – Height District 1XL)

Introduction: This Initial Study and Negative Declaration (IS/ND) has been prepared in accordance with the California Environmental Quality Act (CEQA) and State Guidelines for Implementation of CEQA. It serves as the environmental document for the proposed Hearts of Los Angeles Arts and Recreation Center project. The primary intent of this document is to (1) determine whether project implementation would result in potentially significant or significant impacts to the environment; and (2) to determine the need for project design modifications to eliminate the project's potentially significant or significant project impacts or reduce them to a less than significant level.

In accordance with CEQA, projects that have potential to result in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, must undergo analysis to disclose the potential significant effects. The provisions of CEQA apply to California governmental agencies at all levels, including local agencies, regional agencies, State agencies, boards, commissions, and special districts. CEQA requires the preparation of an Initial Study (IS) for a discretionary project such as the Hearts of Los Angeles Arts and Recreation Center, to determine the range of potential environmental impacts of that project, and define the scope of the environment document. As specified in the CEQA Guidelines Section 15064(f), the lead agency may prepare a Negative Declaration (ND) if, in the course of the IS analysis, it is recognized that the project will not have a significant impact on the

environment. The City of Los Angeles (City) Department of Recreation and Parks (DRP), as the lead agency for the proposed project, has the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation. During the review process, it was determined that potential impacts were less than significant. As a result, the lead agency also determined no mitigation measures were required to reduce or eliminate any potentially significant project-related impacts. Therefore, a ND for the proposed project was prepared.

Responses to Initial Public Concerns: Several comments on the Draft IS/ND that was circulated for public and agency for a 20-day public review period, between May 4, 2017, to May 23, 2017, were received. Attachment 1 presents the detailed comments and the associated responses. Based on the comments, there are no changes to the Draft IS/ND required, and constitutes the Final IS/ND.

Project Description: The subject property is located at 615-625 S. La Fayette Park Place in the MacArthur Park / Koreatown community of Los Angeles, California (the "Property"). The Property is owned by the Los Angeles Department of Recreation and Parks and is currently developed with Lafayette Park. The Project Site is identified as a 23,544 square foot area within the larger irregularly-shaped Property. While the Project Site is only 23,544 square feet, the larger park / Property is approximately 9.72-acres (374,920 square feet) and extends from Wilshire Boulevard (southerly border) to West 6th Street (northerly border), and from La Fayette Park Place (easterly border) to Commonwealth Avenue (westerly border). See Figure 1, Regional Vicinity and Project Location Map, and Figure 2, Aerial View of the Project Site and Vicinity.

Heart of Los Angeles (HOLA) and the Los Angeles Department of Recreation and Parks propose to add a building to the existing park along the La Fayette Park Place frontage, north of the existing Lafayette Multipurpose Community Center building, and near the corner of La Fayette Park Place and West 6th Street. The new building would house the Heart of Los Angeles (HOLA) Arts and Recreation Center. HOLA is an organization that provides extracurricular activities in academics, arts, and athletics to underserved youth in Los Angeles. The proposed Arts and Recreation Center (the "proposed Project") would provide three levels of space for activities including large and small ensemble rooms for music practice and performance, club rooms for academic and art use, offices, reception area and lobby, and roof deck. See Figure 3, Proposed Site Plan

The ground-floor rooms are designed to open to the park with moveable walls so that the public can watch performances and interact with the HOLA activities. The building would be located on a 23,544 square foot site within the larger 9.72-acre park. The existing park currently contains a gymnasium, outdoor basketball courts, a children's play area, community room, picnic tables, a lighted soccer field, skate park, lighted tennis courts, a Senior Citizen's center, a LAPD drop-in center and the Felipe de Neve Branch Library.

The proposed Project's new building would complement the existing park by providing space for shared recreational programming with the Recreation and Parks Department for programs including Zumba, dance, karate, Play for Peace, Kids on the Move Fitness, and Girls on the Run physical education classes. The proposed new building would accommodate these and other existing programs HOLA currently provides across La Fayette Park Place in adjacent buildings. These programs would be relocated to this new building once construction is completed. The proposed building also offers the ability for both HOLA and the Recreation and Parks Department to continue to provide for the evolving needs of the local community in the newly constructed space.

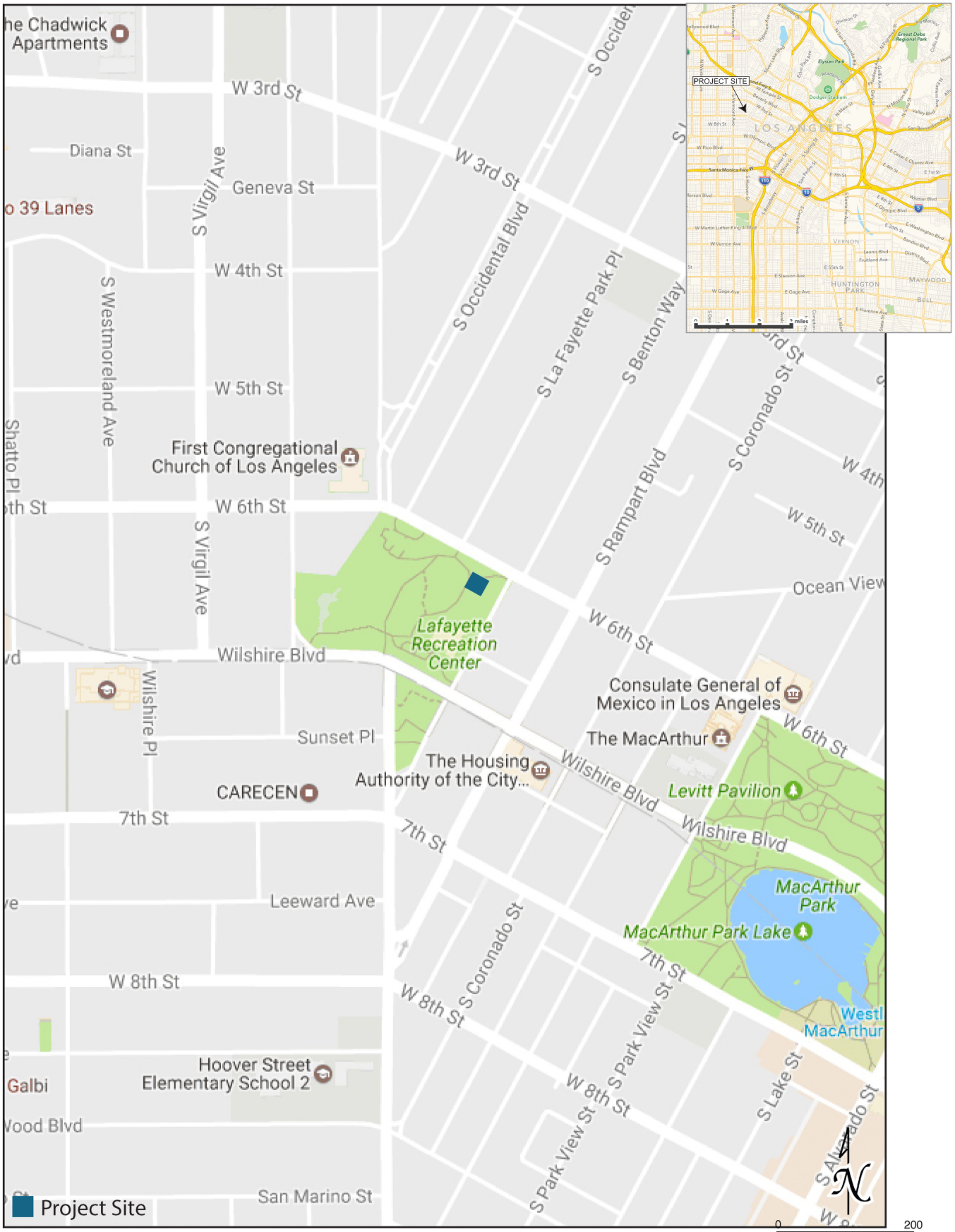
Architecturally, the building is designed to fit in with the natural slope of the park at this site. The building is three stories, but only two stories are visible from La Fayette Park Place.

The building will be sustainably designed to meet and/or exceed all Los Angeles County current building code and Title 24 requirements. The building design will include Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high performance building envelopment.

In order to construct the proposed arts and recreation center, removal of existing picnic tables on the Project Site and removal of approximately 23 trees. All trees removed as part of the Project would be replaced per Recreation and Parks standards.

Pursuant to Los Angeles Municipal Code Section 14.00 A and B, the applicant has received approval from the Los Angeles Planning Department for a Public Benefit Project with alternative compliance measures including zero (0) new parking stalls and other minor deviations from the performance standards identified in LAMC Section 14.00 A as allowed under LAMC Section 14.00 B.

The project is seeking a lease agreement between HOLA Community Partners and the City of Los Angeles Department of Recreation and Parks for construction and operation of the proposed Arts and Recreation Center.



Source: GoogleEarth, April 2017.

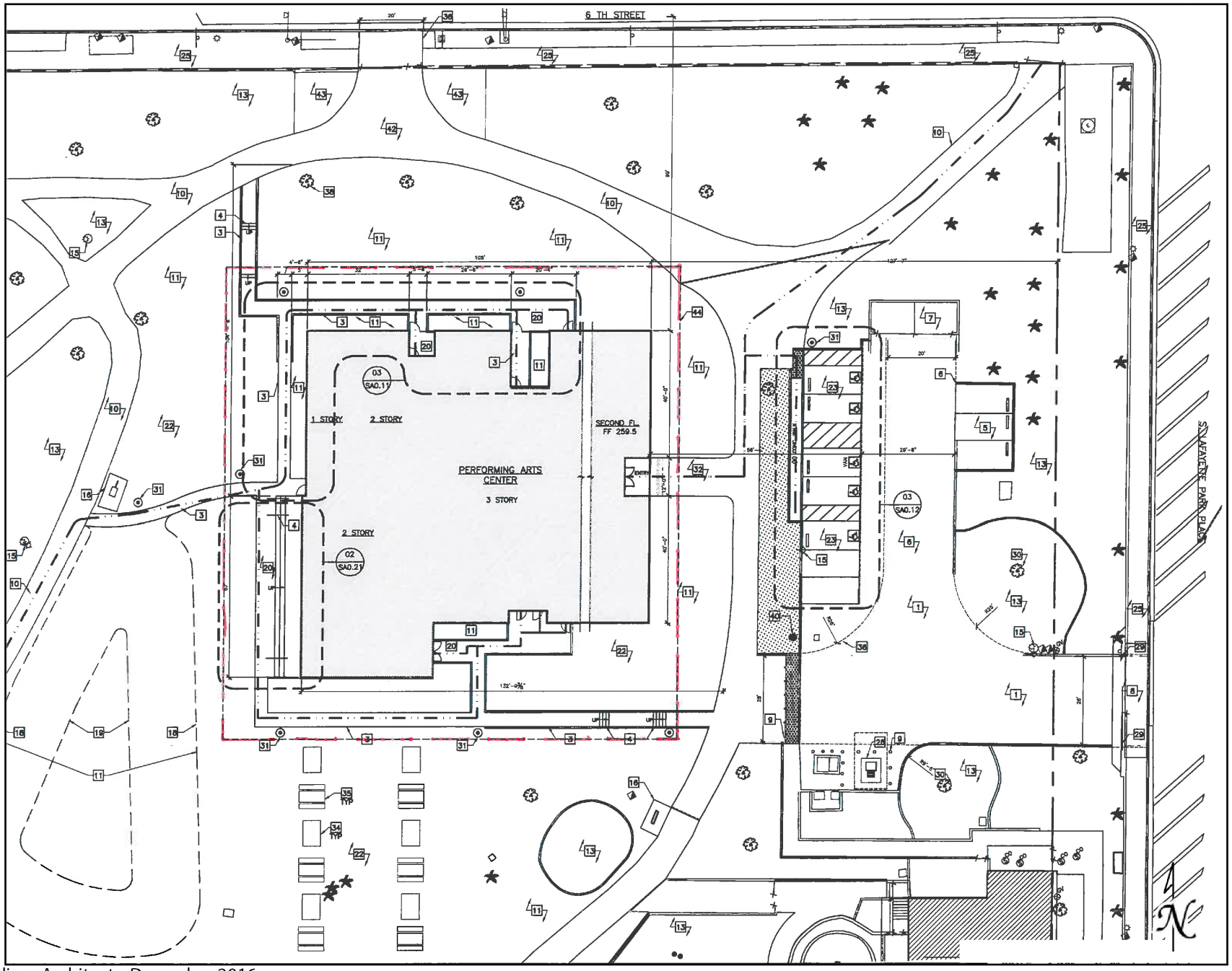
EcoTierra consulting

Figure 1
Regional Vicinity and Project Location

Source: Historic Resources Group, March 2017.

EcoTierra consulting

Figure 2
Aerial View of the Project Site and Vicinity



Source: Berliner Architects, December 2016.

EcoTierra consulting

Figure 3
Proposed Site Plan

Project Construction: The Project proposes to use prefabricated structures, and would therefore require a construction period of approximately nine (9) months.

Environmental Setting / Surrounding Land Uses: The subject property is located at 615-625 S. La Fayette Park Place in the MacArthur Park / Koreatown community of Los Angeles, California. The Property is owned by the Los Angeles Department of Recreation and Parks and is currently developed with Lafayette Park. The Project Site is identified as a 23,544 square foot area within the larger irregularly-shaped Property. While the Project Site is only 23,544 square feet, the larger park / Property is approximately 9.72-acres (374,920 square feet) and extends from Wilshire Boulevard (southerly border) to West 6th Street (northerly border), and from La Fayette Park Place (easterly border) to Commonwealth Avenue (westerly border)

The Felipe de Neve Branch Library occupies the northwest corner of the Property, and a skate park is located on the western side of the park. The Lafayette Multipurpose Community Center is located on the easterly edge of the park north of Wilshire Boulevard. The Center presently contains a community room, two offices, a kitchen, storage, and restrooms, and has a balcony on the west side overlooking the park. There is also a Los Angeles Police Department drop-in center on the Property. The building was authorized in 1963 under ZA 16835, which waived the 49 parking spaces based on the seating capacity of clubhouse, and permitted a 0-foot setback from the property line abutting La Fayette Park Place. The facility currently has five handicapped and five non-handicapped on-site parking spaces near the recreation center.

The adjacent street, La Fayette Park Place, where parking is available, has a right-of-way width of 120 feet and a 60-foot roadway. La Fayette Park Place is currently landscaped, including palm trees at 10-foot intervals and other evergreen materials across the entire block frontage. There is a 6-foot metal fence surrounding the entire recreation facility. In 1980, the Zoning Administrator approved an addition to the building which included an auditorium with a stage, a director's office, two clubrooms, a storage area, and restrooms. In the central portion of the park there is a volleyball court, and a sand pile with slides and playground equipment. The remainder of the park is open and devoted to passive recreation.

Surrounding properties are within the C1-2, C2-2, C4-2, R4-2, and R5-2 Zones and are developed with a substantial number of mid- and high-rise buildings, generally with minimal step backs or setbacks that increase the sidewalk widths.

The First Congregational Church of Los Angeles is located northwest of the property on 6th Street and Commonwealth Avenue and the Superior Court Building (formerly CNA Insurance building) is located directly adjacent to the Property at the southeast corner of 6th Street and Commonwealth Avenue. The northwest and southwest corners of 6th Street and Commonwealth Avenue are currently being used for surface parking. Further east, the north side of 6th Street is used for general offices, with stores and neighborhood services east of Benton Way. Areas north of the 6th Street frontage are developed with high-density multi-story residential dwellings.

Facing the recreation center on the easterly side of La Fayette Park Place is a parking lot serving a three-story Medical Office building and surrounding businesses. On both northern corners of Wilshire Boulevard and Rampart Boulevard are high-rise residential buildings, one 9 stories and one 13 stories.

The southeast corner of Wilshire Boulevard and La Fayette Park Place is developed with a two-story office building used for professional training (Adams College of English) and a Chuck E. Cheese restaurant. The triangular-shaped parcel to the west has two tennis courts and grass covered areas. The Wilshire Boulevard frontage west of Hoover Street is primarily used for unenclosed parking, plus a Midway Automobile Leasing office. Sunset Place is developed with apartment buildings of varying heights and sizes.

A 13-story residential building, formerly the Sheraton Town House, occupies the west side of Commonwealth Avenue facing the park. Several blocks further west beyond Virgil Avenue is the Wilshire/Vermont Metro Rail Station and several blocks south of the site is the Westlake/MacArthur Park Metro Rail Station.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

City of Los Angeles Department of Planning
On March 14, 2017 the City of Los Angeles Department of City Planning approved the Project with a Director's Determination to Conditionally Approve an Alternative Compliance for a Public Benefit Project to permit the new construction of a three-story, 24,860 square-foot governmental enterprise building reaching a maximum height of 41 feet, 6 inches with zero (0) parking spaces with adoption of associated findings and Conditions of Approval. The Department of City Planning also adopted Categorical Exemption No. ENV-2016-3672-CE as the Project's environmental clearance pursuant to the California Environmental Quality Act and Subsection c, Section 2, Article II, City CEQA Guidelines.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

❑AESTHETICS	❑GREENHOUSE GAS EMISSIONS	❑POPULATION AND HOUSING
❑AGRICULTURE AND FOREST RESOURCES	❑HAZARDS AND HAZARDOUS MATERIALS	❑PUBLIC SERVICES
❑AIR QUALITY	❑HYDROLOGY AND WATER QUALITY	❑RECREATION
❑BIOLOGICAL RESOURCES	❑LAND USE AND PLANNING	❑TRANSPORTATION /CIRCULATION
❑CULTURAL RESOURCES	❑ MINERAL RESOURCES	❑TRIBAL CULTURAL RESOURCES
❑GEOLOGY AND SOILS	❑NOISE	❑UTILITIES
		❑MANDATORY FINDINGS OF SIGNIFICANCE

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Paul J. Davis

Signature

Paul J. Davis, Environmental Supervisor

Printed Name

April 20, 2017

Date

Department of Recreation and Parks

For

Evaluation of Environmental Impacts:

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

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

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

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

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

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

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

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

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

7. The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

8. Climate Change Impacts: When determining whether a Project's impacts are significant, the analysis should consider, when relevant, the effects of future climate change on : 1) worsening hazardous conditions that pose risks to the Project's inhabitants and structures (e.g., floods and wildfires), and 2) worsening the Project's impacts on the environment (e.g., impacts on special status species and public health).

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS**. Would the Project:				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	❑	❑	☒	❑

Less Than Significant Impact. A significant impact may occur if a Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of 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 part of a park, which is located in an urbanized setting and is surrounded by mid- and high-rise commercial, institutional, parking lots, and multi-family residential uses. The Project Site slopes gently downward into the park, and there are currently no scenic vistas visible from or immediately adjacent to the Project Site due to the location within the highly developed and urban area. Panoramic views in this area are obstructed by intervening buildings. There are no prominent topographic features on the Project Site from which scenic vistas could be viewed, and in fact because of the gently downward sloping nature of the Project Site, the park affords more obstructed views than would be found outside of the park. Similarly, views of the mountains or ocean are not readily available from the Project Site or the streets surrounding the site. The Project Site is not located within or along a designated scenic corridor. Due to the location of the Project Site and the surrounding development, there are no expansive views through the Project Site to scenic or visual resources in any direction. The Project Site does not contain any unique scenic vistas. No visual resources are located in the vicinity of the Project Site with the potential to be considered scenic resources. Therefore, impacts to views would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS WITHIN A STATE SCENIC HIGHWAY?	❑	❑	❑	☒

No Impact. A significant impact would occur only if scenic resources would be damaged and/or removed by development of a Project.

The nearest designated scenic highways to the Project Site are Highland Avenue, north of Wilshire Boulevard, which is approximately three miles west of the Project Site, and Stadium Way, approximately three miles northeast of the Project Site.[1] The proposed Project is not located along or within the scenic vistas or viewsheds of these scenic highways. Therefore, the proposed Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	❑	❑	☒	❑

Less Than Significant Impact. The Project Site is located within the Wilshire Community Plan area. The existing land uses located within the Wilshire Community Plan area are characterized by a dense concentration of high to medium density/intensity commercial, retail, mixed-use, and multi-family residential uses.

The First Congregational Church of Los Angeles is located northwest of the property on 6th Street and Commonwealth Avenue and the Superior Court Building (formerly CNA Insurance building) is located directly adjacent to the Property at the southeast corner of 6th Street and Commonwealth Avenue. The northwest and southwest corners of 6th Street and Commonwealth Avenue are currently being used for surface parking. Further east, the north side of 6th Street is used for general offices, with stores and neighborhood services east of Benton Way. Areas north of the 6th Street frontage are developed with high-density multi-story residential dwellings.

Facing the recreation center on the easterly side of La Fayette Park Place is a parking lot serving a three-story Medical Office building and surrounding businesses. On both northern corners of Wilshire Boulevard and Rampart Boulevard are high-rise residential buildings, one 9 stories and one 13 stories.

The southeast corner of Wilshire Boulevard and La Fayette Park Place is developed with a two-story office building used for professional training (California Adam's College) and a Chuck E. Cheese restaurant. The triangular-shaped parcel to the west has two tennis courts and grass covered areas. West of Hoover Street the Wilshire Boulevard frontage is primarily used for unenclosed parking, plus a Midway Automobile Leasing office. Sunset Place is developed with apartment buildings of varying heights and sizes.

A 13-story residential building, formerly the Sheraton Town House, occupies the west side of Commonwealth Avenue facing the park. Several blocks further west beyond

[1] California Scenic Highway Mapping System, State of California Department of Transportation, website: http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.

Virgil Avenue is the Wilshire/Vermont Metro Rail Station and several blocks south of the site is the Westlake/MacArthur Park Metro Rail Station.

The proposed Project would alter the visual character of the Project Site as it would result in the addition of a building on space currently used as park open space. However, the Project would not introduce incompatible visual elements to the Project Site or to the surrounding area as the proposed use would be consistent with the uses in the park and the character of the surrounding area and the existing uses in the immediate vicinity of the Project Site.

The Project proposes the construction of a three-story building, built into the downward slope of the park so that two stories are visible from the surrounding streets and three stories are visible when viewed from inside the park. Land uses in the immediate vicinity of the Project Site include mid- to high-rise development generally ranging from two to 13 stories. The building heights and massing of the proposed Project would create a change in the visual character of the Project Site from what currently exists in this portion of the park. However, it would be similar in height and massing compared to the surrounding commercial, office, and multi-family residential structures surrounding the Project Site and is consistent with the visual character of the area and the surrounding C1-2, C2-2, C4-2, R4-2, and R5-2 zoned parcels.

The buildings surrounding the Project Site vary in age and architectural style from more contemporary structures to buildings that were constructed from the 1940s. The proposed Project's design is a style that is more compatible with the contemporary designs that have been incorporated in buildings constructed in the area over the past 20 years. The proposed Project would include architectural features, such as planters, balconies, and other articulated elements to the exterior façade. Varying building materials are proposed such as glass, metal panels, and other such contemporary materials to provide consistency with the recent development that has occurred near the Project Site.

As a result of the building's architectural design and orientation on the Project Site, the proposed Project would be effectively integrated into the aesthetics of the Project Site and area by means of design, architecture, size, massing, and location. Furthermore, the proposed Project's location, height, scale, and architectural features are generally compatible with existing and planned development for the Wilshire Community Plan area. The Project would enhance the park's existing landscaping in open space areas and along the edges of the park at La Fayette Park Place and 6th Street.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	❑	❑	☒	❑

Less Than Significant Impact. The Project Site is located in a well-lit urban park in an urban, developed area where there are moderate levels of existing ambient nighttime lighting including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures which passes through windows) and automobile headlights. Artificial light impacts are largely a function of proximity. The Project Site is located within an urban environment, so that light emanating from any one source contributes to rather than is solely responsible for lighting impacts on a particular use. Since development surrounding the Project Site is already impacted by lighting from existing development within the area, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any notable effect.

Although there are no residential uses directly adjacent to the portion of the park where the Project is proposed, the proposed Project would include lighting which would be wall mounted or ground mounted and would be directed downward and shielded. Wall mounted security lighting would remain lit all night at each entrance and/or exit. Furthermore, the majority of lighting associated with the proposed Project would be directed internally to the Project Site, away from neighboring land uses. Interior and exterior lights on the Project Site would not shine directly onto light-sensitive uses, and would not result in light trespass, as there are no sensitive uses adjacent to this portion of the park. Therefore, impacts associated with illumination would be less than significant.

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 highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but increases the ambient heat reflectivity in a given area.

The exterior portions of the proposed building would utilize various non-reflective material designed to minimize the transmission of glare from buildings. In addition, the proposed building would incorporate exterior landscaping, as necessary, to reduce potential glare generated by windows and glass panels. As such, impacts associated with glare would be less than significant.

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

II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are

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

significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:

a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	❑	❑	❑	☒

No Impact. The Project Site is a portion of an existing urban park. No Farmland, agricultural uses, or related operations are present within the Project Site or surrounding area. Due to the urban setting, the Project Site and surrounding area are not included in the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the proposed Project would not result in any impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	❑	❑	❑	☒

No Impact. The Project Site is not zoned for agricultural uses or enrolled under the Williamson Act. In addition, the Project Site is not located within a designated Agricultural Opportunity Area. Therefore, no conflict with agricultural zoning, designated Agricultural Opportunity Area, or Williamson Act contracts would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	❑	❑	❑	☒

No Impact. The Project Site and the surrounding area are not zoned for forest land,

timberland, or timberland zoned Timberland Production. Therefore, no conflict with forest land or timberland zoning would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒

No Impact. The Project Site is located within a park in an urbanized area. The Project Site portion of the park is currently improved with paved and dirt walking trails, grass, and palm trees. No forest land or related operations are present within the Project Site or surrounding area. Therefore, the proposed Project would not result in the loss of forest land or the conversion of forest land to non-forest use.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	❑	☒

No Impact. As discussed above, no Farmland, agricultural uses, forest land, or related operations exist on or near the Project Site. Accordingly, the proposed Project would not directly or indirectly cause the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, no impacts to Farmland or forest land would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a. CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air

standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2016 RTP/SCS accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Wilshire Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The proposed Project is consistent with the City's Projected growth capacity for the Community Plan area, which accommodated a Projected population of 337,144 persons and housing base of 138,330 units by 2010.[2] The City has not updated Projections beyond 2010 for the Community Plan area.

The proposed Project would not add any housing or population to the City of Los Angeles or the region. As such, the RTP/SCS accommodates the proposed non-housing development through its overall accommodation of Projected population growth in the entire region. As such, the Project would not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table 1
Project Consistency With Air Quality Management Plan Growth Forecast

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project
2012	3,845,500	0	1,325,500	0
2020	4,017,000		1,441,400	
2040	4,609,400		1,690,300	

Source: DKA Planning 2017 based on SCAG 2016 Regional Transportation Plan Growth Forecast.

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. For a detailed analysis of the Project's consistency with the applicable policies of the General Plan see Appendix A (Air Quality and Greenhouse Gases Impact Report). As such, the proposed Project's impact on the City's General Plan would be considered less than significant.

[2] City of Los Angeles, *Wilshire Community Plan*, http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf, accessed March 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	❑	❑	☒	❑

Less Than Significant Impact.

An Air Quality and Greenhouse Gases Impact Report was prepared for the Project by Douglas Kim + Associates (see Appendix A). The following incorporates and summarizes the Air Quality findings of that report.

Regulatory Setting

Federal

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

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, and attainment/unclassified for CO and NO_2.

State

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

incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

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

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Construction Impacts on Regional Air Quality

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.1 model using a construction schedule of up to nine months. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use Projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use Projects throughout California.[3]

Construction activities associated with the Project would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate $PM_{2.5}$ and PM_{10} emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of reactive organic gas (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2016.3.1) recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities.

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[3] See www.caleemod.com.

Nonetheless, Table 2 summarizes the proposed construction schedule that was modeled for air quality impacts and Table 3 identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

Table 2
Proposed Construction Schedule

Phase	Duration	Notes
Fabrication of Structures	8/10/17-11/4/17	Assumes on-site fabrication
Site Preparation	9/17/17-10/16/17	Clearing of improvements, trees
Grading	10/17/17-12/29/17	Grading
Building Construction	12/30/17-2/10/18	Installation of modular
Paving	2/11/18-3/14/18	Landscaping and paving
Architectural Coatings	3/15/18-4/27/18	
Source: DKA Planning, 2017		

As shown in Table 3 the construction of the proposed Project will produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the proposed Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table 3
Estimated Daily Construction Emissions - Unmitigated

Construction Phase Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2017	1	13	9	<1	1	1
2018	8	12	8	<1	1	1
Maximum Regional Total	8	13	9	<1	1	1
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	8	13	8	<1	1	1
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2017 based on CalEEMod 2016.3.1 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.						

Construction Impacts on Local Air Quality

In terms of local air quality, the proposed Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Likewise, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD. As a result, construction impacts on localized air quality are considered less than significant.

Fugitive dust emissions of PM_{10} and $PM_{2.5}$ would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3 assumes the application of BACMs to control fugitive dust.

Construction of the proposed Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or future air quality violation and impacts would be less than significant.

Operation Phase Impacts on Regional Air Quality

The Project proposes construction of a new, three-story arts and recreation center. As such, air pollutant emissions would be generated at the Project site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the Project Site. Specifically, the Project could add vehicle trips to and from the Project Site associated with administrative functions, classes, training, and other community functions at the start of operations in 2018. The analysis of daily operational emissions associated with the proposed Project has been prepared utilizing CalEEMod 2016.3.1, as recommended by the SCAQMD. Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions (Table 4). As a result, the Project's operational impacts on regional air quality are considered less than significant.

Operation Phase Impacts on Local Air Quality

With regard to localized air quality impacts, the proposed Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in Table 4, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality are considered less than significant.

Table 4 **Estimated Daily Operational Emissions - Unmitigated**						
Emission Source	**Pounds per Day**					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	3	8	<1	2	1
Net Regional Total	**1**	**3**	**8**	**<1**	**2**	**1**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**1**	**<1**	**<1**	**<1**	**<1**	**<1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**2**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2017 based on CalEEMod 2016.3.1 model runs. LST analysis based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.						

The long-term operation of the proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality. Impacts would be less than significant.

		Potentially Significant Impact	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	❑	❑	☒	❑

Less Than Significant Impact.

Construction Phase Air Quality Cumulative Impacts

A project's construction impacts could be considered cumulative considerable if it substantially contributes to cumulative air quality violations when considering other Projects that may undertake concurrent construction activities.

Construction of the proposed Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM_{10} and $PM_{2.5}$ would not exceed

mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when Projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself would not produce cumulative considerable emissions of localized nonattainment pollutants PM_{10} and $PM_{2.5}$, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. This is considered a less than significant impact.

If any other proposed Projects were to undertake construction concurrently with the proposed Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of SCAQMD Localized Significance Thresholds (LST) to each cumulative Project in the local area would help ensure that each Project does not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any Projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

Construction of the proposed Project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors.

Operation Phase Cumulative Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table 4, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a recreation-related administrative facility that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants.

Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑

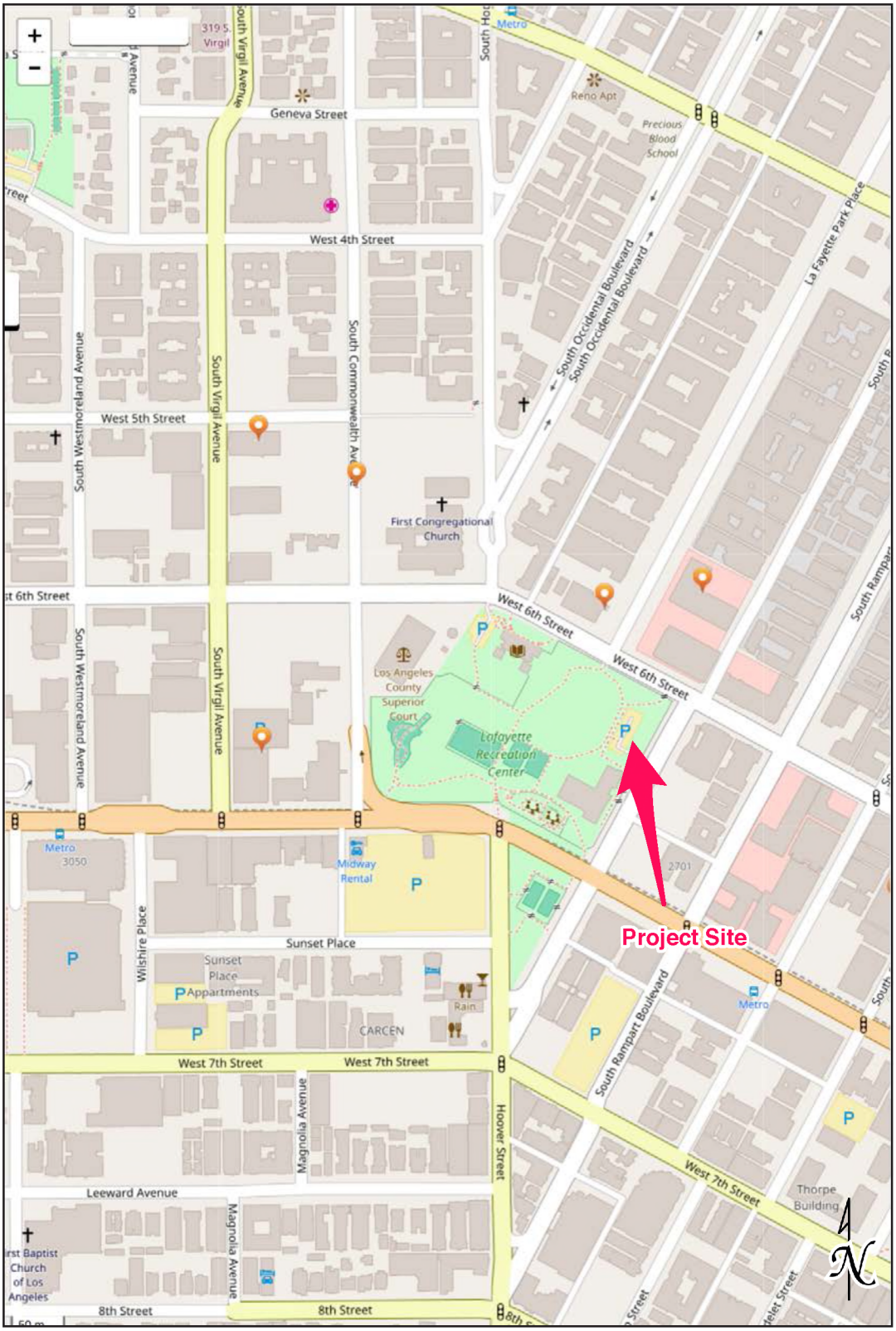
Less Than Significant Impact.

Construction Phase Air Quality Impacts on Sensitive Receptors

Construction of the proposed Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

- Senior Citizens Center, 90 feet southeast of the Project Site;
- Pilgrim School, 540 Commonwealth Avenue; 540 feet northwest of the Project Site;
- Larchmont Charter School at La Fayette Park, 2801 West 6th Street;
- LASR Charter School, 520 South La Fayette Park Place, 300 feet north of the Project Site;
- McAlister High School, 611 South Carondelet Street, 970 feet east of the Project Site;
- Charles White Elementary School, 2401 Wilshire Boulevard, 1,230 feet east of the Project Site;
- Newton International College, 2975 Wilshire Boulevard, 780 feet west of the Project Site; and
- Medical office buildings at 500 and 520 South Virgil Avenue, as close as 960 feet northwest of the Project Site.

The locations of these receptors are shown in Figure 4, Location of Sensitive Receptors. As shown in Table 3, these nearby receptors would not be exposed to substantial concentrations of localized pollutants PM_{10} and $PM_{2.5}$ from construction of the proposed Project. Specifically, construction activities would not exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$ and represent a less than significant impact. LST thresholds represent the maximum emissions from a Project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard. Construction of the proposed Project would not have any significant impacts on pollutant concentrations at nearby receptors.



Source: Douglas Kim + Associates, LLC, April 2017.

Operation Phase Air Quality Impacts on Sensitive Receptors

CO hotspots

The proposed Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[4]

Toxic Air Contaminants

Finally, the Project would not result in any substantial emissions of Toxic Air Contaminants (TACs) during the construction or operations phase. TACs are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[5] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term Project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[6] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be

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[4] Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

[5] California Office of Environmental Health Hazard Assessment. *Health Effects of Diesel Exhaust*. www. http://oehha.ca.gov/public_info/facts/dieselfacts.html

[6] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

less than significant. Long-term operation of the proposed Project would not have any significant impacts on pollutant concentrations at nearby receptors and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑

Less Than Significant Impact. According to the SCAQMD CEQA Air Quality Handbook[7], 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 proposed Project involves the construction and operation of an arts and recreation center as an accessory to a park, which is not typically associated with odor complaints. As the proposed Project involves no elements related to industrial Projects, no objectionable odors are anticipated. Potential sources of odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. The proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity associated with the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits discharge of air contaminants that cause nuisance odors. Therefore, the potential impacts associated with objectionable odors would be less than significant and no further analysis of this issue is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.	**BIOLOGICAL RESOURCES**. Would the Project:				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	☒	❑

Less Than Significant Impact. The Project Site is a 23,544 square foot site within the larger 9.72-acre La Fayette Park. The park currently contains a gymnasium, outdoor basketball courts, a children's play area, community room, picnic tables, a lighted

[7] SCAQMD, CEQA Air Quality Handbook, 1993.

soccer field, skate park, lighted tennis courts, a Senior Citizen's center, a LAPD drop-in center and the Felipe de Neve Branch Library. The City of Los Angeles includes 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 south Los Angeles portions of the City contain fewer natural areas.[8] According to Exhibit C-2 of the *L.A. CEQA Threshold Guide*, the Project Site and immediately surrounding area is not identified as a biological resource area or a County of Los Angeles Significant Ecological Area.[9]

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. There are no known locally designated natural communities at the Project Site. Furthermore, although the Project Site is located within a park, the site is not located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State or federally listed species.

The Project Site includes 39 trees: 16 of which would be retained at the site and 23 of which would be removed as part of the Project. The Project would preserve all heritage trees on the Project Site. They would be protected in place with other mature canopy trees. The proposed building footprint would affect three canopy trees and in order to provide required handicapped access two relatively young canopy trees would be removed and replaced for a project total of five canopy trees to be removed. These five removed trees would be replaced with 10 canopy trees. There is one very young ash tree that would be transplanted on the Project Site. The Project is located on a site with an extensive grove of Mexican fan palms, some queen palms and a few California fan palms. The palms provide little effective shade for the seating area below. Thirteen palms are located within the footprint of the proposed building. Four palms are located in the area of the proposed seating mound. One palm is located in the area where three parking spaces would be created. This adds up to a total of 18 palms to be replaced with 18 canopy trees. All palms that are not affected by the project would be protected in place.

While trees on the Project Site could contain bird nests, the birds would be substantially accustomed to urban activity. The Project proponent would be required to comply with the federal Migratory Bird Treaty Act of 1918 (50 C.F.R. Section10.13), and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, if removing trees from the Project Site. Therefore, the Project would have a less than significant impact on sensitive biological species or habitat and no further analysis is required.

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

[9] City of Los Angeles Department of City Planning, General Plan, Conservation Element, Exhibit B2, SEAs and Other Resources, January 2001.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, AND REGULATIONS OR BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	❑	☒

No Impact. The Project Site is a 23,544 square foot site within the larger 9.72-acre La Fayette park. The park currently contains a gymnasium, outdoor basketball courts, a children's play area, community room, picnic tables, a lighted soccer field, skate park, lighted tennis courts, a Senior Citizen's center, a LAPD drop-in center and the Felipe de Neve Branch Library. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[10] Consequently, the Project Site does not support any sensitive natural communities, such as riparian habitat, coastal sage scrub, oak woodlands, or non-jurisdictional wetlands. Therefore, the proposed Project would not have any impact on any sensitive natural communities, and no further analysis of this issue is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	❑	❑	❑	☒

No Impact. The Project Site is a 23,544 square foot site within the larger 9.72-acre La Fayette park. The park currently contains a gymnasium, outdoor basketball courts, a children's play area, community room, picnic tables, a lighted soccer field, skate park, lighted tennis courts, a Senior Citizen's center, a LAPD drop-in center and the Felipe de Neve Branch Library. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site.[11] Further, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (see

[10] Environmental and Public Facilities Maps: Significant Ecological Areas, Los Angeles City Planning Department, September 1, 1996.

[11] U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, accessed: March 2017.

Section IV(b), above) and no impacts to riparian or wetland habitats would occur with implementation of the proposed Project.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	❑	❑	☒

No Impact. As discussed in Section IV(a), the Project Site is a 23,544 square foot site within the larger 9.72-acre La Fayette park. The park currently contains a gymnasium, outdoor basketball courts, a children's play area, community room, picnic tables, a lighted soccer field, skate park, lighted tennis courts, a Senior Citizen's center, a LAPD drop-in center and the Felipe de Neve Branch Library. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the vicinity of the Project Site. Therefore, implementation of the proposed Project would have no impact on the movement of any resident or migratory fish or wildlife species.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	WOULD THE PROJECT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS A TREE PRESERVATION POLICY OR ORDINANCE?	❑	❑	❑	☒

No Impact. As discussed above, the Project Site includes 39 trees: 16 of which would be retained at the site and 23 of which would be removed as part of the Project. The Project would preserve all heritage trees on the Project Site. They would be protected in place with other mature canopy trees. The proposed building footprint would affect three canopy trees and in order to provide required handicapped access two relatively young canopy trees would be removed and replaced for a project total of five canopy trees to be removed. These five removed trees would be replaced with 10 canopy trees. There is one very young ash tree that would be transplanted on the Project Site. The Project is located on a site with an extensive grove of Mexican fan palms, some queen palms and a few California fan palms. The palms provide little effective shade for the seating area below. Thirteen palms are located within the footprint of the proposed building. Four palms are located in the area of the proposed seating mound. One palm is located in the area where three parking spaces would be created. This adds up to a total of 18

palms to be replaced with 18 canopy trees. All palms that are not affected by the project would be protected in place.

Department of Recreation and Parks designated Heritage Trees are individual trees of any size or species that are specially designated as heritage because of their historical, commemorative, or horticultural significance. Layfayette Park has a designated Heritage Trees of the Firewheel Tree (Stenocarpus Sinuatus), none of which would be removed as part of the Project. Trees protected under City of Los Angeles Ordinance No. 177,404 include Valley Oak, California Live Oak, and any other tree of the oak genus indigenous to California, excluding the Scrub Oak; Southern California Black Walnut; Western Sycamore; and the California Bay. There are no City of Los Angeles protected trees located on the Project Site, and therefore none of these tree species would be affected by the Project. The Project Site does not support oak woodlands or contain oak or other unique native trees, such as junipers, Joshuas, or southern California black walnut. Therefore, the proposed Project would not affect any oak woodlands or other unique native trees, and no further analysis of this issue is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. WOULD THE PROJECT CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	❑	☒

No Impact. The Project Site 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. Therefore, no impact would occur with implementation of the proposed Project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the Project:				
a. CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	❑	☒	❑

Less Than Significant Impact. A substantial adverse change in the significance of an 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.[12] The CEQA Guidelines go on to state that "[t]he significance of an historic resource is materially impaired when a Project… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources… local register of historic resources… or its identification in a historic resources survey."[13] A Historic Impacts Assessment was prepared for the Project by Historic Resources Group (see Appendix B). The following incorporates and summarizes the findings of that report.

In the late 1890s the area that is now Lafayette Park was a natural depression located at what was then the city's western boundary. The land was donated to the Los Angeles Department of Parks by Clara Shatto, the wife of developer George Shatto, who owned Catalina Island from 1887 to 1891. The land was developed into a park and was christened "Sunset Park" at a Park Commissioners' meeting on March 6, 1896. Sunset Park became the western boundary of the neighboring Wilshire Boulevard Tract, subdivided in 1895 by Henry Gaylord Wilshire and his brother William on a 35-acre barley field located just east of the newly-created Westlake Park (later renamed MacArthur Park). The Wilshire brothers intended to improve the eight-block tract with opulent single-family residences that would attract wealthy patrons to move west of Westlake Park. To garner attention and fanfare for the new subdivision, Wilshire laid out a 120-foot-wide graveled road stretching the four blocks from Westlake Park to Sunset Park. The wide road bordered with concrete sidewalks created an appealing streetscape, and Wilshire's fledgling tract soon grew into one of the city's first elite enclaves.[14]

An 1896 report titled "Lungs of Los Angeles" described plans for Sunset Park, which consisted of a terraced design with a large oval bicycle path. Archival photographs show that, in the early 1910s, the park was laid out in a picturesque manner typical of parks of that era. The park incorporated curvilinear paths, earthworks, and a wide range of decorative plantings. In 1920 Sunset Park was renamed Lafayette Park after American Revolutionary War hero Gilbert du Motier, Marquis de Lafayette. In 1937 Arnold Foerster, a Federal Art Project sculptor from Glendale, crafted for the park a statue of the Marquis de Lafayette to symbolize the friendship between the United States and France.

The 2009 "Wilshire Center and Koreatown Recovery Redevelopment Area Intensive Historic Resources Survey," conducted by PCR Services Corporation for the City of Los Angeles Community Redevelopment Agency, identified Lafayette Park as eligible for listing in the National Register, at the local level of significance, under Criterion A; in the California Register under Criterion 1; and as a local Historic-Cultural Monument. It is

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12 CEQA Guidelines, section 15064.5(b)(1).

13 CEQA Guidelines, section 15064.5(b)(2).

14 Excerpted and adapted from PCR Services Corporation for the City of Los Angeles Community Redevelopment Agency, "Wilshire Center and Koreatown Recovery Redevelopment Area Intensive Historic Resources Survey," 2009.

therefore considered an historical resource for purposes of this assessment.

Felipe de Neve Branch Library

The Felipe de Neve Branch Library is located at 2820 West 6th Street on the elevated northern edge of Lafayette Park. It was constructed in 1929 and was named in honor of the Spanish governor of Alta California who ordered the founding of the Pueblo of Los Angeles in 1781. The library was designed by architect Austin Whittlesey in the Romanesque Revival style. It is a two-story building with a rectangular plan and a low-pitched side gable roof clad in clay Mission tiles. The exterior walls are of brick masonry construction with decorative horizontal banding of cast stone, and a frieze inset with ceramic tiles in a pattern of crosses and diamonds. The primary entrance is symmetrically located on the north façade and consists of a pair of paneled wood doors, deeply recessed in a round-arched opening with a decorative cast stone surround. Fenestration on the primary (north) façade consists of stacked, divided light casement windows in tall, narrow apertures. Fenestration on the south façade consists of large, round-arched, divided light casement windows overlooking terraced gardens that lead down to the park. Two brick-and-glass pavilions flanking the south façade were added as part of a 1998 Project to rehabilitate, seismically retrofit, and expand the branch.[15]

In 1987 the Felipe de Neve Branch Library, along with several other Los Angeles branch libraries, was individually listed in the National Register of Historic Places under a thematic group submittal. In 1989 the library was designated Los Angeles Historic-Cultural Monument No. 452.[16] It is therefore a historical resource as defined by CEQA.

Lafayette Multipurpose Community Center

The Lafayette Multipurpose Community Center is located at 625 South La Fayette Park Place, in the southeast portion of Lafayette Park. It was originally constructed in 1963 as the Lafayette Park Senior Citizen Center. The original building was designed by Glendale architect Graham Latta (1906-1992) who designed many Mid-century Modern civic and institutional buildings in Southern California including schools, libraries, fires stations, and recreation centers, as well as residences and office buildings. The original, approximately 4,000-square-foot building was two stories in height and Mid-century Modern in style, with a rectangular plan, a roof of concrete barrel vaults, and exterior walls of brick. In 2011 the Center was remodeled and expanded with an approximately 11,000-squarefoot addition, designed by Los Angeles architect Stephen Kanner, which includes classrooms, community rooms, and a gymnasium.[17] Historic aerial photographs indicate that at approximately the same time, the open area northwest of

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15 "Felipe de Neve Branch Library," STIR Architecture, http://www.stirarchitecture.com/about/our-work/felipe-de-nevebranch-library (accessed February 24, 2017).

16 "Felipe de Neve Branch Library," LAPL Landmarks, http://www.laplhistoricsites.org/felipe.php (accessed February 23, 2017).

17 Christopher Hawthorne, "Lafayette Park Recreation Center extends an arm to area kids," Los Angeles Times, May 8, 2011, http://www.articles.latimes.com/print/2011/may/08/entertainment/la-ca-lafayette-20110508 (accessed February 23, 2017).

the Community Center was re-landscaped; the existing grass and canopy trees were removed, and replaced with exposed earth and palm trees.[18]

The Lafayette Multipurpose Community Center was not identified in the 2009 "Wilshire Center and Koreatown Recovery Redevelopment Area Intensive Historic Resources Survey," either individually or as a contributing feature of Lafayette Park. Due to the extensive alterations and expansion of the building in 2011 it no longer retains sufficient integrity to convey its original Mid-century Modern design, or any historical association with mid-20th century development of the park and the Westlake neighborhood. It is therefore not individually eligible for listing in the National Register or the California Register, or as a local Historic-Cultural Monument; and it is not a contributing feature of Lafayette Park. It is not considered an historical resource for purposes of this assessment.

Project Impact Analysis

The Project will construct a new, three-story community center on what is currently open space that consists of exposed earth landscaped primarily with palm trees, some of which will be removed to accommodate the proposed new construction. The Project would not involve the demolition of any historical resources in Lafayette Park or in the vicinity.. The palm trees will be replaced per Recreation and Parks standards. Because the landscape design and features of Lafayette Park have previously been substantially altered, the proposed new building will not demolish any significant character-defining features of the park. This area of the park was re-landscaped about 2011, in connection with the addition to the nearby community center. No heritage trees are located in this portion of the park, and no heritage trees would be removed in the scope of this Project. The majority of the park's nearly ten acres will remain unaltered by the Project, and the Project would not demolish the Felipe de Neve Branch Library or any other historical resources in the surrounding area.

The Project does not involve relocation of any buildings, structures or character-defining landscape features of Lafayette Park. As discussed above, the Project will construct a new, three-story community center on what is currently an under-utilized open space of exposed earth landscaped with palm trees. Some of these trees will be removed to accommodate the new construction. However, the landscape design and features of Lafayette Park have previously been substantially altered, and the removal of these palm trees will not impact the park's integrity or its significance under Criterion A/1.

The Project would not involve the conversion or rehabilitation of Lafayette Park or the Felipe de Neve Branch Library. The Project would involve alterations to Lafayette Park. The Project would construct a new, three-story, 24,860-square-foot building on what is currently an open space that consists of exposed earth, landscaped primarily with palm trees. However, in order for this alteration to be considered a substantial adverse change, it must be shown that the integrity and/or significance of Lafayette Park would be materially impaired by the proposed alteration.

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18 Historic Aerials, https://www.historicaerials.com/viewer# (accessed February 29, 2017).

The proposed new building will occupy space that has historically been open, and some of the trees currently occupying the site will be removed to accommodate the new construction. The landscape design and features of Lafayette Park have previously been substantially altered. The portion of the park that contains the Project Site appears in a circa 1913 photograph as a lawn area dotted with specimen trees and surrounded by curvilinear paths. Historic aerial photographs show that this remained a lawn area into the early 21st century, although the plantings and path configurations changed. By 2012, possibly in connection with the expansion of the nearby community center, this portion of the park had been completely re-landscaped; the lawn and existing canopy trees were removed and replaced with exposed earth and palm trees.

The Project will alter the existing landscaping in the northeast portion of Lafayette Park on the Project Site, but because the landscape in this portion of the park was previously altered, the proposed new building will not alter any significant character-defining features of the park. The proposed building will be located in an area that has historically been open space; however, the proposed new building's footprint is comparatively small in relation to the size of the park, and the entire Project Site occupies only 23,544 square feet, approximately 5.5%, of the park's total area of 9.72-acres. Most of the northeast portion of the park surrounding the new building will remain open space, and the majority of the park's nearly ten acres will remain unaltered by the Project. Lafayette Park was determined eligible for listing under Criterion A/1 as a public park associated with the westward expansion of Los Angeles in the late 19th century. According to National Park Service guidance, a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person.[19] Although the park's landscape design, features and materials have been substantially altered, it retains its original boundaries and remains a public park composed primarily of landscaped, recreational open space. After construction of the Project, Lafayette Park will continue to retain its original boundaries and will remain a public park composed primarily of recreational open space, and therefore will retain sufficient integrity to convey its significance under Criterion A/1.

As discussed above, the Project would construct a new, three-story, 24,860-square-foot building on what is currently an open space that consists of exposed earth, landscaped primarily with palm trees. Because the landscape in this portion of the park was previously altered, the proposed new building will not alter any significant character-defining features of the park; and because the proposed new building's footprint is comparatively small in relation to the size of the park, the majority of the park's nearly ten acres will be unaltered by the Project and will remain recreational open space.

The proposed new building would be located more than 100 feet southeast of the existing Felipe de Neve Branch Library, and would sit at a lower grade than the library

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[19] National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: National Park Service, U.S. Department of Interior, 1997), 46.

due to the existing topography of the site. The new building's overall height, to the top of the stair penthouse, will be 39'-8". However, the main roof height of 33'-6" would be almost the same as the library, which is approximately 34 feet in height. This would be mitigated by the new building's location at a lower grade and by its horizontal distance from the library. The Project would not materially impact the library in any way.

As discussed above, Lafayette Park was determined eligible for listing under Criterion A/1 as a public park associated with the westward expansion of Los Angeles in the late 19th century. According to National Park Service guidance, a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person.[20] Although the park's landscape design, features and materials have been substantially altered, it retains its original boundaries and remains a public park composed primarily of landscaped, recreational open space. After construction of the Project, the majority of Lafayette Park's nearly ten acres will remain a public park consisting primarily of recreational open space. The park will therefore retain sufficient integrity to convey its significance under Criterion A/1. The Felipe de Neve Branch Library will remain unaltered. The integrity and significance of both resources will therefore remain materially unimpaired by the proposed new construction.

Conclusion

Analysis of the potential impacts to historical resources has demonstrated that the Project will not relocate, convert, or rehabilitate historical resources located on the Project Site or in the vicinity; and that the proposed new construction and resulting alterations to Lafayette Park will not materially impair the significance or integrity of the park or the Felipe de Neve Branch Library. Therefore, the Project will not result in a substantial adverse change in the significance of these historical resources. They will continue to convey their historical significance after construction of the Project, and will maintain their eligibility for listing in the National Register of Historic Places, the California Register of Historical Resources, and as local Historic-Cultural Monuments. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	❑	❑	☒	❑

Less Than Significant Impact. Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas map, the Project Sites and the immediately surrounding areas do not contain any known archaeological sites or

[20] National Register Bulletin 15, 46.

archaeological survey areas.[21] In addition, the proposed Project is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including the construction of office uses and parking on the Sites in the past. Any archaeological resources that may have existed near the surface are likely to have been disturbed or previously removed. However, because the proposed Project will result in deeper excavations than previously performed on the site, the possibility exists that deeper lying archeological artifacts may be present that were not recovered during prior construction or other human activity. While the uncovering of notable resources is not anticipated, should archaeological resources be discovered during grading or construction activities, compliance with Public Resources Code (PRC) Section 21083.2 is required. According to the regulation, work would cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, as required by existing regulatory requirements. The required compliance would ensure any found deposits are treated in accordance with federal, State, and local guidelines, including those set forth in to PRC Section 21083.2. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	❑	❑	☒	❑

Less Than Significant Impact. No unique geologic features are located on the Project Site, which is entirely developed with commercial and surface parking lot uses. Based on a review of City of Los Angeles Vertebrate Paleontological Resources and Invertebrate Paleontological Resources maps, the Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.[22] However, a large portion of the Los Angeles Basin is underlain by bedrock and older surface sediments where fossils may be found.[23] The proposed Project may result in deeper excavations than previously performed, and as such, the possibility exists that deeper lying paleontological artifacts that were not recovered during prior construction or other human activity may be present. As a result, the proposed Project could uncover a unique paleontological resource or unique geologic feature. Should paleontological resources be discovered during grading or construction, existing regulatory requirements would require the City of Los Angeles Department of Building and Safety to be notified immediately, and all work to cease in the area of the find until a

[21] City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.
[22] City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.
[23] City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Invertebrate Paleontological Resources in the City of Los Angeles, September 1996.

qualified paleontologist evaluates the find. The required compliance would ensure that the found deposits would be 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.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑

Less Than Significant Impact. 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. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	**GEOLOGY AND SOILS.** Would the Project:				
a.	EXPOSURE OF 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 Site 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.

A Geotechnical Engineering Investigation was performed for the Project by Geotechnologies, Inc (see Appendix C). The following incorporates and summarizes the findings of that report. According to the Website NavigateLA, developed by the City of Los Angeles, Bureau of Engineering, Department of Public Works, a northwest-southeast trending fault is located approximately 30 feet to the north of the proposed structure.[24] The fault source is listed as the California Geological Survey (CGS) digital database of Fault Activity Map of California. However, as part of the Geotechnical Engineering Investigation conducted by Geotechnologies, Inc, the CGS website was reviewed and the Fault Activity Map does not show this unnamed fault.

Geologic maps by Lamar (1970), Dibblee (1989), Yerkes, et al, (1977), and the Department of Water Resources (1961) do not show this fault. The fault does not have a designated Fault-rupture Hazard Zone (Bryant, W.A. and Hart, E.W. 2007). The origin of this fault is unknown to this firm. Geotechnologies, Inc. contacted a City of Los Angeles Department of Building and Safety geologist, to inquire about the origin of this fault. While the geologist was aware that the NavigateLA website showed the trace of a fault, he did not know of the existence of any fault within this area of Los Angeles. Furthermore, he indicated that no Special Studies Zones have been delineated by the City of Los Angeles Department of Building and Safety along this fault trace.

A comparison of the boring logs drilled for this investigation was made to identify any unusual geologic conditions that may suggest the presence of a fault. Each of the borings encountered interlayered siltstone and sandstone. The bedrock samples did not exhibit shears or slickensides that are suggestive of faulting. In addition, the bedrock surface is relatively uniform, encountered at elevations of 235 feet to 238 feet above mean sea level. Based on the research by Geotechnologies, Inc, the presence of the fault as shown on the NavigateLA Website could not be corroborated or verified on other references. Therefore in the opinion of Geotechnologies, Inc, the fault need not be considered in the design of the proposed structure.

Furthermore, development at the Project Sites would incorporate the recommendations of the preliminary geotechnical assessments as a Project design element. In addition, adherence to design and construction standards, as required by State and County regulations and codes, would ensure maximum practicable protection for users of the buildings such that they can withstand acceptable risk. All aspects of seismic-related hazards, other geotechnical hazards, and erosion and sedimentation issues are regulated by Los Angeles County and/or the State of California. Therefore, impacts related to ground rupture from known earthquake faults at the Project Sites would be less than significant.

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[24] NavigateLA, City of Los Angeles, Bureau of Engineering, Department of Public Works, http://navigatela.lacity.org/navigatela/ accessed April 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
ii.	STRONG SEISMIC GROUND SHAKING?	❑	❑	☒	❑

Less Than Significant Impact. Because the Los Angeles region is generally considered to be geologically active, most Projects would be exposed to some risk from geologic hazards, such as earthquakes. Thus, in order to be considered a significant geologic impact under the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the Project must exceed the typical risk of hazard for the region. Therefore, a significant impact may occur if a Project represents an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California.

The property is subject to strong seismic shaking from regional conditions. As discussed above, based on borings conducted and review of fault maps and records, there are no faults directly underlying the Project Site. However, as with any Southern California location, the primary geologic hazard at the site is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. Therefore, the proposed Project would be designed and constructed in accordance with state and local building codes to reduce the potential for exposure of people or structures to seismic risks to the maximum extent possible. The proposed Project would be required to comply with the California Department of Conservation, Division of Mines and Geology (CDMG) requirements for the evaluation and mitigation of earthquake related hazards, and with the seismic safety requirements in the Uniform Building Code (UBC) and the LAMC. Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable with current engineering practices. Therefore, impacts related to strong seismic ground shaking would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	❑	❑	☒	❑

Less Than Significant Impact. Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. The possibility of liquefaction occurring at a given site is dependent on several factors, including: anticipated intensity and duration of ground shaking; the origin, texture, and composition of shallow sediments (in general, cohesionless, fine-grained sediments such as silts or silty sands, and areas of uncompacted or poorly compacted fills are more prone to liquefaction); and the presence of shallow groundwater.

The Seismic Hazards Maps of the State of California (CDMG, 1999), do not classify the site as part of the potentially "Liquefiable" area. This determination is based on groundwater depth records, soil type and distance to a fault capable of producing a substantial earthquake. In addition, bedrock was encountered in the exploratory borings at depths ranging between 10 and 15 feet below the existing grade. The underlying bedrock is not considered to be subject to liquefaction due to its moderately hard to hard consistency, and its long tectonic history. Based on the above considerations, the site is not considered susceptible to liquefaction during the design-based seismic event and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
iv.	LANDSLIDES?	❑	❑	❑	☒

No Impact. The probability of seismically-inducted landslides the Project Site is low due to the lack of significant slopes on the site and surrounding areas. Moreover, the Project Site is not within an area identified as having a potential for seismic slope instability. The Project Site included in an area of "Landslide Inventory and Hillside Areas" and there are no known landslides at the Project Site, nor is the Project Site in

the path of any known or potential landslides.[25] Therefore, no impact from landslides would occur at the Project Site.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	❑	❑	☒	❑

Less Than Significant Impact. The Project Site portion of the park is currently an open space that consists of exposed earth, landscaped primarily with mature palm trees. The overall park is a 9.72-acre, irregularly-shaped parcel with basketball courts, soccer fields, a skate park, picnic shelters, paved pathways, statuary, and mature vegetation. Portions of the park are planted with turf, but large portions consist of a combination of exposed earth and playing fields.

During construction, grading and excavation would expose 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, development would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the County and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations for General Construction. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	❑	❑	☒	❑

Less Than Significant Impact. Potential impacts with respect to liquefaction and landslide potential are evaluated in Checklist Questions 6 (a)(iii) and 6 (a)(iv), above.

The site was explored by Geotechnologies, Inc, on January 4, 2016, by excavating

[25] City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, June 1994.

three borings and one test pit. (See Appendix C). The borings were excavated to depths ranging between 20 and 25 feet, with the aid of a truck-mounted drilling machine using 8-inch diameter hollowstem augers. The test pit was excavated to a depth of 6 feet with the aid of a hand tools. The location of the exploratory excavations was determined from hardscape features shown on the attached Plot Plan. Elevations of the exploratory excavations were approximated from elevation contours presented in the NavigateLA Website, developed by the City of Los Angeles, Bureau of Engineering, Department of Public Works. The location and elevation of the exploratory excavations should be considered accurate only to the degree implied by the method used.

Geologic Materials

Fill

Fill materials were encountered in all exploratory excavations to depths ranging between 2 and 7 ½ feet below the existing site grade. The fill consists of a mixture of sand, silt and clay, which ranges from yellowish brown to dark gray in color, and is moist, medium dense, or stiff, and fine grained.

Alluvium

The existing fill is underlain by native alluvial soils, consisting of interlayered mixtures of clay, sand and silt. These native alluvial soils range from medium brown to grayish brown in color, and are moist, medium dense, or stiff, and fine grained.

Bedrock

Bedrock was observed underlying the alluvium in all three borings, at depths ranging between 10 and 15 feet below the existing grade. The bedrock underlying the site is comprised of thin bedded siltstone and sandstone, and is yellowish and grayish brown in color, moist, moderately hard to hard in consistency, with individual siliceous beds, and weathered layers. More detailed descriptions of the earth materials encountered may be obtained from individual logs of the subsurface excavations.

There is no evidence that the Project Site is susceptible to lateral spreading or subsidence. The site is not located on or near a hillside area, and there are no known unique geologic conditions present that would suggest that the site is subject to unstable soil conditions. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general vicinity. Therefore, there is little or no potential for ground subsidence due to withdrawal of fluids or gases at the site.

All construction would comply with the City of Los Angeles Building Code, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions, and the recommendations of the approved Geotechnical Engineering Investigation by Geotechnologies, Inc. With the implementation of Building Code requirements (see discussion of Checklist Question 6(a)(ii), above), potential impacts due to landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	❑	❑	☒	❑

Less Than Significant Impact. According to the Geotechnical Engineering Investigation prepared by Geotechnologies, Inc. (Appendix C), onsite geologic materials are in the high expansion range. The Expansion Index was found to be between 92 and 98 for representative bulk samples. As a result, Geotechnologies recommended reinforcing, which is further detailed in the "Foundation Design" and "Slab-On-Grade" sections of the Geotechnical Engineering Investigation which was reviewed and approved by the City of Los Angeles Department of Building and Safety. The recommendations include removal of expansive soils. With implementation of the recommendations provided in the approved Geotechnical Engineering Investigation, impacts would be less than significant, and further analysis of this issue is not required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	❑	❑	❑	☒

No Impact. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Project development at the Project Site would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the Project:				
a. GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	❑	❑	☒	❑

Less Than Significant Impact.
An Air Quality and Greenhouse Gases Impact Report was prepared for the Project by Douglas Kim + Associates (see Appendix A). The following incorporates and summarizes the GHG findings of that report.

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single Project's impact will be negligible. To further complicate this, there is debate about whether a Project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting carbon dioxide (CO_2) into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a Project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual Project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Pollutants and Effects

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

GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[26]
- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[27]
- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[28] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF_6) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development Projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[29] As illustrated in Table 5, the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

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

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

[28] United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N_2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001

[29] California Air Resources Board, Climate Change Emission Control Regulations, 2004

Table 5 **Global Warming Potential for Greenhouse Gases**	
Greenhouse Gas	**Global Warming Potential Factor (100-Year)**
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF_6)	23,500
Source: California Air Resources Board, *First Update to the Climate Change Scoping Plan*. May 2014. Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.	

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission (CEC) report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result. Additional detail regarding the regulatory setting of GHG is provided in Appendix A.

Existing Emissions

The Project Site is currently unimproved open space with passive recreation opportunities. As such, it does not generate any substantial anthropogenic GHG emissions.

Methodology

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

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use Projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use Projects throughout California.[30]

Significance Criteria

CARB, SCAQMD and the City of Los Angeles have yet to adopt Project-level significance thresholds for GHG emissions that would be applicable to the Project.[31] As a result, this analysis relies on primary direction from the CEQA Guidelines. Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

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30 See www.caleemod.com.

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

The following section provides an extensive analysis of the Proposed Project's consistency with these State, regional, and local climate action-related policies. This section focuses on disclosing potential GHG emissions.

Construction Phase Impacts on Climate Change

Construction of the proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Site. These impacts would vary day to day over the nine-month duration of construction activities. As illustrated in Table 6, construction emissions of CO_2 would peak in 2017, when up to 1,391 pounds of CO_2e per day are anticipated. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 6
Estimated Construction Emissions – Mitigated (Pounds per Day)

Construction Year	CO_2	CH_4	N_2O	CO_2e
2016	1,382	<1	0	1,391
2017	1,359	<1	0	1,369
Source: DKA Planning, 2017, based on CalEEMod 2016.3.1				

Operations Phase Impacts on Climate Change

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

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

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020.

Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with Project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, Project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the Project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in Table 7, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 576 and 850 $MTCO_2e$ per year, respectively, which shows the Project will reduce emissions by 32 percent from the CARB 2020 NAT scenario. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table 7
Estimated Annual CO2e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	<1	<1	-	0%
Energy Sources	343	199	-144	-42%
Mobile Sources	438	308	-131	-30%
Waste Sources	12	12	-	0%
Water Sources	55	55	-	0%
Construction	3	3	-	0%
Total Emissions	850	576	-275	-32%

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

* NAT scenario does not assume 30% reduction in in mobile source emissions from

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

Source: DKA Planning, 2017.

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

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for Project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Proposed Project would contribute to statewide GHG reduction goals. Specifically, the Proposed Project's location in an existing urban setting provide opportunities to reduce transportation-related emissions. It would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. It would also attract existing trips on the street network that would divert to the proposed uses.

These would result in concomitant reductions in CO_2e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the Proposed Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

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

1. Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
2. Transportation. Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.
3. Energy Use. Both construction and operational activities from the Project Site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renwable energy sources by December 31, 2030.

4. Building structures. Operational efficiences will be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.
5. Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
6. Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
7. Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

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

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

As described throughout this analysis and in Appendix A, the Project contains numerous regulatory compliance measures that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	❑	❑	☒	❑

Less Than Significant Impact.

The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Proposed Project would be consistent with a number of relevant plans and policies that govern climate change.

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

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

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

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

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[32,33]

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

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. The Proposed Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[34] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[35]

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[36]

- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.[37]

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.[38]

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

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

34 CARB, First Update, pp. 37-39, 85, May 2014.

35 CARB, First Update, pp. 40-41, May 2014.

36 CARB, First Update, pp. 55-56, May 2014.

37 CARB, First Update, p. 65, May 2014.

38 CARB, First Update, p. 69, May 2014.

Based on this evaluation and further details as provided in Appendix A, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, Projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The proposed Project is consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the site's location near substantial local transit bus services, and in close proximity to Metro Rail station places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS Projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the site will produce substantial reductions in auto mode share to and from the site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Additional detail regarding Project consistency with the 2016-2040 SCAG RTP/SCS is provided in Appendix A. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Proposed Project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Consistency with the City of Los Angeles Green Building Ordinance[39]

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

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

The Proposed Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.[40] As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

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

    - Reduced parking based on compliance with the City's bicycle parking ordinance.
    - Access to several public transportation lines. The location is well-served by public transit, including bus routes operated by Metro and Metro Rail stations nearby.
    - Located near residential neighborhoods. The Project Site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

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39 City of Los Angeles, Ordinance 181480, adopted December 15, 2010.

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

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

    - Use of low-emitting paints, adhesives, carpets, coating, and other materials.
    - Equipment and fixtures will comply with the following where applicable:
        - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
        - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
        - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
        - Installed tank type water heaters will have an Energy Factor higher than .6.
        - Installed tankless water heaters will have an Energy Factor higher than .80.
        - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
        - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

    - An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.
    - A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
    - Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

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

per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

- Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or
- A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

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

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

  - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;
  - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

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

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

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

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

Cumulative Impacts

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

Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the Project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific Project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; AB 32, the 2012-2035 RTP/SCS and the City of Los Angeles Green Building Ordinance and Mobility 2035 Plan.

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

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

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

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

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and Project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 30 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

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

Thus, given the Project's consistency with State, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are cumulatively less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIX.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the Project:				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	❑	❑	☒	❑

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with development at the Project Site would be typical of those used in other commercial/institutional developments (e.g., cleaning solvents, 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 would 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 adequately reduced to a less-than-significant level through compliance with these standards and regulations. 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. A less-than-significant impact would occur, and further analysis of this issue is not required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	❑	❑	☒	❑

Less Than Significant Impact. A Phase I Environmental Site Assessment (ESA) was conducted for the Project by All Phase Environmental, Inc. (see Appendix D). The following incorporates and summarizes the findings of that report.

As discussed above, construction and operation of the proposed Project would involve the limited use of potentially hazardous materials. However, compliance with applicable standards and regulations and adherence to manufacturer's instructions in the use, transport, or disposal of hazardous materials would be expected to minimize or avoid the accidental release of hazardous materials or waste into the environment.

Additionally, the Project Site is located within a "Methane Zone" as designated by Los Angeles Department of Building and Safety (LADBS).[41] Due to the potential environmental risk associated with Methane Zones, a methane investigation was conducted at the Project Site by Methane Specialists on August 19, 2016.

City of Los Angeles Methane Requirements
Requirements for control of methane intrusion in the City of Los Angeles are specified in Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code ("Division 71 "). Since the Project is within the Methane Zone, the Los Angeles Department of Building and Safety (LADBS) has the authority to withhold permits for construction unless detailed plans for adequate protection against methane intrusion are submitted, if testing leads to methane mitigation being required.

The level of methane protection required depends upon the "design methane concentration," which is defined in Division 71 as "the highest concentration of methane gas found during site testing." Site testing is required to determine the design concentration, unless the developer accepts the most stringent methane mitigation requirements ("Level V"). If site testing is performed (e.g., to document that a lower level of mitigation is justified), then it must follow a protocol published by the Department of Building and Safety, "Site Testing Standards for Methane" (PIBC 2002-101, November 30,2004).

P/BC 2002-101 prescribes a three-step process for methane evaluation:

1. Scheduling site testing either before or 30 days after any site grading;
2. Conducting shallow soil gas tests (not less than 4 feet, bsg); and
3. Installing and using multiple-depth gas probe sets where the highest concentrations of soil gases are expected to be found.

Methane Investigation
For the first step, site testing was scheduled for August 18, and 19, 2016. Methane Specialists also notified Underground Service Alert of Southern California to mark the site for underground utilities, and the utilities were subsequently marked and cleared.

For the second step, PIBC 2002-101 requires one shallow sampling location for every 10,000 square feet, or portion thereof, of site area, with a minimum of two shallow soil gas probe locations. Although the Project Site is 23,544 square feet, Methane Specialists explored an area of 40,000 square feet to conservatively include a larger area than is proposed for development; therefore, a minimum of four (4) shallow sampling locations were required.

The third step in the City's methane evaluation process is to collect a minimum of two samples at multiple depths, and at least one multiple-depth prob set per every 20,000

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[41] City of Los Angeles Department of City Planning, Parcel Profile Report, 2820 W 6th Street and 625 S La Fayette Park Place, website: www.zimas.lacity.org, accessed April 2017.

square feet, or portion thereof. Thus, the minimum of two (2) multiple-depth deep gas probe sets were also required.

For field data sampling and analysis, Methane Specialists conducted shallow and multi-depth probe site testing conducted on August 18, and 19, 2016 at the site. Based on LADBS Methane Code Table IA, significant levels of methane were encountered while testing at this site. Thus, according to Table IA, for the Methane Zone, this Project falls under Design Level IV, with less than 2 inches of water-column gas-pressure. Therefore, as per said Methane Code Table IA, this Project does require both passive, and active, methane mitigation systems.

The Project would be required to comply with the methane mitigation systems required for Projects within Design Level IV. With compliance with the existing regulatory measures for Design Level IV, potential impacts from construction in a methane zone would be remediated and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	❑	❑	☒	❑

Less Than Significant Impact. There are six schools within a quarter-mile of the Project Site:

- Larchmont Charter School at La Fayette Park, 2801 West 6th Street, approximately 230 feet northwest of the Project Site;
- Pilgrim School, 540 Commonwealth Avenue; 540 feet northwest of the Project Site;
- LASR Charter School, 520 South La Fayette Park Place, 300 feet north of the Project Site;
- McAlister High School, 611 South Carondelet Street, 970 feet east of the Project Site;
- Charles White Elementary School, 2401 Wilshire Boulevard, 1,230 feet east of the Project Site; and
- Newton International College, 2975 Wilshire Boulevard, 780 feet west of the Project Site.

As discussed above, the proposed Project provides for a community-serving arts and recreation center that would involve the limited use and storage of common hazardous substances typical of those used in commercial/institutional developments. In addition, the potential impact related to the accidental release of hazardous materials would be to less than significant. As such, the potential impact of the proposed Project to emit or

handle hazardous or acutely hazardous materials or waste within one-quarter mile of sensitive uses would be less than significant, and no further analysis of this issue is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	❑	❑	☒	❑

Less Than Significant Impact. A Phase I Environmental Site Assessment was conducted for the site on February 23, 2017 (see Appendix D). Historical information was obtained from Sanborn Fire Insurance Maps, aerial photographs, and USGS Topographic maps. Based on an analysis of these documents, the subject property appears to have never been developed and has had no obvious historical uses other than being a park.

There were no past tenants that would be expected to have used significant quantities of hazardous materials or petroleum products and there were no records of such uses. There were no records of spills, releases, or violations from former subject property tenants. There were no historical recognized environmental conditions or controlled recognized environmental conditions identified in the historical documents reviewed.

The subject property was depicted as vacant or as a park in all the Sanborn Fire Insurance Maps. The adjacent and nearby streets and alleys had already been graded by 1900 as they were observed during the subject property reconnaissance. All of the adjacent sites were also depicted as vacant or as park property. The library building to the northwest was first depicted in the 1968 map. The areas immediately northeast and southeast of the subject property were always park land. The sites further to the northeast and southeast, across West 6th Street and South La Fayette Park Place, were depicted as developed with a variety of commercial uses over the years but none that would have been expected to have used significant quantities of hazardous materials or petroleum products. The adjacent area to the southwest was depicted on all of the maps as undeveloped or park land. There were no obvious signs of the storage or disposal of hazardous materials on the subject property in any of these maps.

The subject property was already developed as a park in the historical aerial photograph from 1923 and remained so in all subsequent photographs. As they were observed during the subject property reconnaissance, the adjacent and nearby streets and alleys had already been graded and paved. The immediately adjacent sites were also occupied by the park. Surrounding sites were undeveloped or occupied by what

appeared to be residential structures. Beginning in the 1928 photograph, oil wells could be seen on the sites north of West 6th Street. By 1938, extensive commercial development of the surrounding area was evident. Through the years, the area surrounding the park continued to develop but the immediately adjacent sites remained part of the existing public park.

The use of the surrounding area in the photographs could not be specifically discerned from the aerial photographs but appeared to have been commercial and residential. There were no obvious signs of the storage or disposal of hazardous materials on the subject property or adjacent sites in any of these photographs.

Topographic maps depicted the subject property, adjacent sites, and surrounding areas as vacant, occupied by non-descript structures, as park property, or shaded as developed using house omission tint indicating dense urban development. There were no obvious signs of the storage or disposal of hazardous materials on the subject property in any of the topographic maps.

No environmental liens were found during this investigation. The subject property was not listed in the search of the Federal NPL Liens database. In order for there to be an environmental lien against the subject property, it must be a suspected, or confirmed, contributor to subsurface contamination. Research conducted for this report did not find any uses that would have contributed to subsurface contamination on the subject property and no regulatory agencies identified it as such.

Current uses of the immediately adjacent sites and their addresses as noted on the buildings or researched on-line are as follows:

- Northwest – Parkland followed by the Felipe de Neve Branch of the Los Angeles Public Library at 2820 West 6th Street;
- Northeast – Parkland followed by West 6th Street followed by, from southeast to northwest, South Baylo University and Larchmont Charter School; 2727 and 2801 West 6th Street;
- Southeast – Parkland and a paved parking lot followed by South La Fayette Park Place followed by the Los Angeles Academy of Arts & Enterprise; 600 South La Fayette Park Place.
- Southwest – Parkland and the Lafayette Multipurpose Community Center; 625 South La Fayette Park Place;

Based on observations and research, there is a low likelihood that a recognized environmental condition exists at the subject property as a result of the current adjacent land use. There were no indications that these adjacent sites have Underground Storage Tanks (USTs) or have been identified as a business that would involve the use of significant quantities of hazardous materials.

Past Uses of Adjoining Sites

Historical sources indicated that the site adjacent to and northwest of the subject

property was undeveloped in 1900 and appears to have never been developed other than park uses. The existing library further to the northwest was developed between 1928 and 1938. There were no indications from historical sources indicating that the subject property has been impacted from the northwest adjacent site. The library site was listed in one or more environmental databases. However, this library site generated small quantities of hazardous waste and/or petroleum products for off-site disposal or recycling. There is a low likelihood of a recognized environmental condition.

The site adjacent to and northeast of the subject property was undeveloped in 1900 and appears to have never been developed other than park uses. There were no signs of the storage or disposal of hazardous materials on the northeast adjacent site in the historical information reviewed. There were no indications from historical sources indicating that the subject property has been impacted from this adjacent site.

The existing commercial building further to the north, across West 6th Street, where the current Larchmont Charter School exists, was vacant until the existing commercial building was developed between 1955 and 1958. This site was originally developed as an office building and has since been changed to educational use.

The existing commercial building further to the northeast, across West 6th Street, where the current South Baylo University exists, was vacant until a small commercial building was developed on this site as a hand laundry between 1923 and 1928. This site was then redeveloped with the existing commercial building between 1953 and 1955. This site was originally an office building and has since been changed to educational use.

The site adjacent to and southeast of the subject property was undeveloped in 1900 and appears to have never been developed other than the existing paved parking lot. The parking lot was constructed on this site between 2009 and 2010. There were no signs of the storage or disposal of hazardous materials on the southeast adjacent site in the historical information reviewed. There were no indications from any historical sources that the subject property has been impacted from this adjacent site.

The existing commercial building further to the southeast, across South La Fayette Park Place, where the current Los Angeles Academy of Arts & Enterprise exists, was vacant until single family residences and detached garages were constructed on this site between 1900 and 1906. The residential buildings were removed between 1928 and 1938. This site remained vacant between at least 1938 through 1950. The existing commercial building was constructed on this site between 1950 and 1952. This site was originally an office building and has since been changed to educational use.

The site adjacent to and southeast of the subject property was undeveloped in 1900 and remained undeveloped park land through at least 1952. Between 1952 and 1964, a small building was constructed on part of this site which appears to have been associated with the park. The existing gymnasium was then constructed on this site between 2009 and 2010. There were no signs of the storage or disposal of hazardous materials on the southwest adjacent site in the historical information reviewed. There

were no indications from any historical sources that the subject property has been impacted from this adjacent sites.

The records search and reconnaissance performed in the Phase I ESA has revealed no evidence of recognized environmental conditions, historical recognized environmental conditions, controlled recognized environmental conditions, or de minimis conditions in connection with the subject property. Based on the ESA findings, no further assessment appears warranted at this time and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	❑	❑	❑	☒

No Impact. The Project Site is not located within any airport's influence area, or within two miles of an airport.[42] Therefore, no impact would occur, and further analysis of this issue is not required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	❑	❑	❑	☒

No Impact. The Project Site is not located in the vicinity of a private airstrip. Therefore, no impact would occur, and further analysis of this issue is not required.

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[42] 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: March, 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	❑	❑	☒	❑

Less Than Significant Impact. The Project Site is not located along a City- or County-identified disaster route.[43] [44] The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded. Access for emergency service providers and evacuation routes would be maintained during construction. Therefore, development of the Project is not expected to interfere with any adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and further analysis of this issue is not required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h.	WOULD THE PROJECT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	❑	☒

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[45] Therefore, no impacts from wildland fires would occur.

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43 City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Critical Facilities & Lifeline Systems in the City of Los Angeles, April 1995.

44 Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, website: http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf, accessed: March 20, 2017.

45 City of Los Angeles Department of City Planning, Parcel Profile Report, 2820 W 6th Street and 625 S La Fayette Park Place, website: www.zimas.lacity.org, accessed April 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X.	**HYDROLOGY AND WATER QUALITY.** Would the Project:				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a Project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a Project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001 that requires new development and redevelopment Projects to incorporate storm water mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that "results in the creation, addition, or replacement of 5,000 square feet or more of impervious surface area on an already developed site." Depending on the type of Project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site. Site Specific Mitigation Plans are only required for the following uses: vehicle or equipment fueling, maintenance, washing, and repair areas; commercial or industrial waste handling or storage; outdoor handling or storage of hazardous materials; outdoor manufacturing areas; outdoor food handling or processing; outdoor animal care, confinement, or slaughter; outdoor horticultural activities; and major transportation Projects. The proposed Project would not involve any of these uses. Therefore, the proposed Project would not be required to implement a Site Specific Mitigation Plan.

The proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Additionally for construction activities, the Applicant would be required to prepare and implement a SUSMP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP would detail the treatment

measures and Best Management Practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the Project Storm Water Pollution Prevention (SWPP) Plan. The SWPP Plan would contain BMPs to minimize primarily construction-related water quality impacts, but also contains some permanent BMPs. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level. Through preparation and implementation of both the SWPP Plan and the SUSMP and implementation of a storm water quality treatment system, water quality impacts of the Project would be minimized. Additionally, because the current site does not currently operate under a SUSMP, implementation of the proposed Project with a SUSMP would improve water quality leaving the Project Site in comparison to existing conditions. Thus, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project would not require the use of groundwater at the Project Site. Potable water would be supplied by the Los Angeles Department of Water and Power, which draws its water supplies from distant sources for which it conducts its own assessment and mitigation of potential environmental impacts. Therefore, the Project would not require direct additions or withdrawals of groundwater. During borings conducted by Geotechnologies, Inc, as part of the Geotechnical Engineering Investigation, groundwater seepage was encountered at a depth of 10 and 16.5 feet below ground surface; the historically highest groundwater in the area is approximately 20 feet beneath the ground surface. Siltstone of the Miocene age Puente Formation is present beneath the site at depths ranging from 33 to 35 feet beneath the existing ground surface. The siltstone bedrock is considered non-water bearing and it is likely that the groundwater seepage encountered is representative of a perched groundwater condition on top of the bedrock and is not representative of the regional groundwater table.

It is anticipated that excavation would occur as part of the Project to remove soils incompatible for supporting construction of the proposed development. However, no subterranean levels are proposed as part of the Project so excavation would not be expected to encounter groundwater. Construction of the proposed Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Engineering Investigation, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	❑	❑	☒	❑

Less Than Significant Impact. Construction is regulated by the Los Angeles Building Code (Sections 91.7000 through 91.7016 of the LAMC). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from sedimentation and erosion. Necessary permits, plan checks, and inspections are specified. Also included in these requirements is the provision that any grading work in excess of 200 cubic yards (cy) that will occur between November 1 and April 15 (the "rainy season") must include an erosion control system approved by the Department of Building and Safety.

Under the NPDES, the State Water Resources Control Board has issued two general stormwater discharge permits for Los Angeles County to cover industrial and construction activities. The permits are required for specific industry types based on standard industrial classification and for construction activities on one acre or more.

The RWQCB oversees implementation and enforcement of the general permits, including Waste Discharge Requirements (WDR). The Public Works Department, Bureau of Sanitation, Stormwater Management Division, is the agency responsible for overseeing implementation of permit responsibilities for the City. Presently, under the General Construction Stormwater Permit, Projects greater than one acre are required to incorporate, to the maximum extent possible, permanent or post-construction BMPs in Project planning and design. During Project construction, a temporary alteration of the existing on-site drainage pattern may occur. However, these changes would not result

in substantial erosion or siltation due to stringent controls imposed via NPDES, SWPP and SUSMP regulations as discussed under Section 9(a) above.

Furthermore, the Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Project will be required to implement drainage and run-off requirements consistent with the RWQCB low-impact development standards.

As noted, all the runoff associated with the proposed Project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. Therefore, the proposed Project would not exceed capacity of the existing or planned storm water drainage systems or result in substantial erosion or siltation on- or off-site. Proposed Project impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	❑	❑	☒	❑

Less Than Significant Impact. As noted, all the runoff associated with the proposed Project would be either directed to landscaped areas or directed to the existing storm drain system and would not encounter unprotected soils. The proposed Project would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain system. Therefore, the proposed Project would not substantially alter the existing drainage pattern of the Project area. The proposed Project will be required to control stormwater runoff using best management practices. Proposed Project impacts will be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	❑	❑	☒	❑

Less Than Significant Impact. Based upon the criteria established in the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

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

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Project will implement all applicable and mandatory BMPs in accordance with the SWPPP, SUSMP, and City of Los Angeles Stormwater Management Program. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Activities associated with operation of the proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in parking areas could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the proposed Project must comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, and the SWRCB. Further, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the proposed Project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for water quality impacts to a less than significant level.

In addition, the proposed Project would be subject to the provisions of the Low Impact Development (LID) Ordinance, adopted by the City Council on September 28, 2011, 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 Best Management Practices (BMPs) that promote the use of natural systems for retention, infiltration, evapotranspiration and reuse of stormwater on site. The LID Ordinance will require the Project to incorporate LID standards and practices to encourage the beneficial use of rain water 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 Department of City Planning, Department of Building and Safety 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 site. As such, the Project would result in a less than significant related to polluted runoff.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	❑	❑	☒	❑

Less Than Significant Impact. During construction, sediment is typically the constituent of greatest potential concern. The greatest risk of soil erosion during the construction phase occurs when site disturbance peaks due to grading activity and the removal and re-compaction or replacement of fill areas (sediment is not typically a constituent of concern during the long-term operation of developments similar to the proposed Project because sites are usually paved, and proper drainage infrastructure has been installed). Other pollutants that could affect surface-water quality during Project construction include petroleum products (gasoline, diesel, kerosene, oil, and grease), hydrocarbons from asphalt paving, paints and solvents, detergents, fertilizers, and pesticides (including insecticides, fungicides, herbicides, rodenticides, etc.).

Once the proposed Project has been constructed, urban runoff might include all of the above contaminants, as well as trace metals from pavement runoff, nutrients and bacteria from pet wastes, and landscape maintenance debris may be mobilized in wet-season storm runoff from roadway areas, parking areas, and landscaping, and in dry-season "nuisance flows" may result from landscape irrigation. Liquid product spills occurring at the Project Site could also enter the storm drain. Dry product spills could enter the storm drain via runoff in wet weather conditions or dry-season "nuisance flows." As discussed above, the BMPs required by the the SWPPP, SUSMP, and City of Los Angeles Stormwater Management Program are anticipated to treat storm water runoff and reduce the potential for impacts associated with the degradation of water quality. Therefore, the proposed Project would not degrade water quality, and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	❑	☒

No Impact. The proposed Project does not include construction of housing and therefore would not place housing within a 100-year flood hazard area. No impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	❑	☒

No Impact. The Project Site is in an area designated as "Zone X" (immediately adjacent to a site designated "Zone AH") on the FEMA Q3 Flood Insurance Rate Map, Los Angeles County, map number 06037C1610F, panel number 1610, dated September 28, 2008. These areas have been determined to be outside the 0.2% annual chance floodplain. The nearest significant surface water is the lake at MacArthur Park located approximately 0.35-miles southeast of the subject property. Therefore, as the Project will comply with all building codes, and would not put structures within a 100-year flood plain, no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	❑	❑	☒	❑

Less Than Significant Impact. Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within the mapped tsunami inundation boundaries. Additionally, the Project Site is not within an identified potential inundation area.[46] As such, impacts related to potential inundation from the failure of a levee or dam would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	❑	☒

No Impact. Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landslide, or volcanic eruption. Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within the mapped tsunami inundation boundaries.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. No major water-retaining structures are located immediately up gradient from the Project Site. Therefore, the risk of flooding from a seismically-induced seiche is considered to be remote. Review of the County of Los Angeles Flood and Inundation Hazards Map, Leighton (1990), indicates the site does not lie within mapped inundation boundaries due to a breached upgradient reservoir.

As such, there would be no impacts related to risk of loss, injury, or death by seiche, tsunami, or mudflow and no further analysis is required.

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[46] City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	**LAND USE AND PLANNING.** Would the Project:				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	❑	☒

No Impact. A physical division of an established community is caused by an impediment to through-travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The proposed Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The proposed Project, which would involve the development of an arts and recreation center on a portion of existing park land, would not divide an established community. Therefore, the proposed Project would have no impact related to the division of an established community, and no further analysis of this issue is required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	WOULD THE PROJECT CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING, BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, LOCAL COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	❑	❑	☒	❑

Less Than Significant Impact. The subject property is located within the Wilshire Community Plan area. The Plan map designates the subject property for Open Space, with a corresponding zone of OS. The subject site is zoned OS-1XL. The site is also located in the Wilshire Center/Koreatown Redevelopment Project Area and is identified as a Transit Priority Area.

The site is governed by the Wilshire Community Plan, which has the following objectives and policies related to recreation and park facilities:

Objective 4-1 Conserve, maintain and better utilize existing recreation and park facilities which meet the recreational needs of the community.

Policy 4-1.1 Preserve and improve the existing recreational facilities and park spaces.

Policy 4-1.2 Encourage the shared use of other public facilities for recreational purposes.

The Project fulfills Objective 4-1 through the addition of a new shared use building/facility. The proposed building will be located on a portion of the park currently improved with picnic tables and palm trees. Given its current layout, this portion of the park does not have the necessary space required to provide meaningful active recreational opportunities. And given the number of picnic tables currently located in this area, this portion of the park allows for a minimal amount of landscape and tree canopy.

The construction of this building would enhance this specific area as well as the overall recreation area, by providing additional programming opportunities to the park. The building will provide new, state-of-the-art facilities for HOLA's extracurricular activities, reaching underserved youth in the immediate community while utilizing the existing park and its resources such as the library and skate park, to enhance the site and add new active and safe space for neighborhood families.

The remainder of the park space will benefit from this building as the Project will redistribute the existing picnic tables throughout the park, providing better engagement and activation between of families and the existing recreational opportunities. As well as, the current palm trees, which provide little to no shade, will be replaced with trees that provide a substantial shade canopy. Further enhancing areas that are presently ignored by families looking to utilize the park space.

Objective 4-2 Provide facilities for specialized recreational needs by utilizing existing public lands such as utility easements, Department of Water and Power properties, and unused or underutilized rights-of-way.

Policy 4-2. 1 Underutilized public lands should be considered for open space and recreational purposes.

The Project fulfills Objective 4-2 by adding a new facility to a portion of Lafayette Park that lacks programming. The addition of the proposed building would add a new variety of activities and opportunities to the existing recreation area. And, the Project assists with the greater vision of the park in adding better linkages between picnicking families and the active recreational opportunities offered.

Objective 4-3 Ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens.

Policy 4-3.1 Ensure that parks are adequately policed, monitored, maintained and illuminated for safe use at night, as appropriate.

The Project fulfills Objective 4-3 by adding a new facility to the existing Lafayette Park. The new building will be built in accordance with current building standards, including accessibility, security, and lighting. The new building will add an active component to a corner of the park previously identified by LAPD as one that was challenging to maintain in a safe manner. And, by enhacing safety and security in this portion of the park, the safety of the overall park, and the surrounding community, will be achieved.

Objective 4-4 Expand and improve Neighborhood, Community, and Regional

Parks, and Recreation Centers and Senior Citizen Centers throughout the Wilshire Community Plan Area on an accelerated basis, as funds and land become available. *Policy 4-4. 1* Develop new Neighborhood and Community parks to help offset the Wilshire Community's parkland deficit for both its current population, and for the Projected year 2010 population.

A portion of this Project is being funded through L.A. for Kids - the Proposition K Program. As such, and given its mandate to assist in programming for neighborhood youth, this Project would fulfill Objective 4-4 by expanding and improving the existing Lafayette Park with a new facility.

Pursuant to Los Angeles Municipal Code Section 14.00 A and B, the applicant has received approval from the Los Angeles Planning Department for a Public Benefit Project with alternative compliance measures including zero (0) new parking stalls and other minor deviations from the performance standards identified in LAMC Section 14.00 A as allowed under LAMC Section 14.00 B.

The project is seeking a lease agreement between HOLA Community Partners and the City of Los Angeles Department of Recreation and Parks for construction and operation of the proposed Arts and Recreation Center.

Department of Recreation and Parks designated Heritage Trees are individual trees of any size or species that are specially designated as heritage because of their historical, commemorative, or horticultural significance. Layfayette Park has a designated Heritage Trees of the Firewheel Tree (Stenocarpus Sinuatus), none of which would be removed as part of the Project. Trees protected under City of Los Angeles Ordinance No. 177,404 include Valley Oak, California Live Oak, and any other tree of the oak genus indigenous to California, excluding the Scrub Oak; Southern California Black Walnut; Western Sycamore; and the California Bay. There are no City of Los Angeles protected trees located on the Project Site, and therefore none of these tree species would be affected by the Project.

Consistent with City of Los Angeles requirements, all trees removed for construction of the Project would be replaced at a two to one ration. The Project would preserve all heritage trees on the Project Site. They would be protected in place with other mature canopy trees. The proposed building footprint would affect three canopy trees and in order to provide required handicapped access two relatively young canopy trees would be removed and replaced for a project total of five canopy trees to be removed. These five removed trees would be replaced with 10 canopy trees. There is one very young ash tree that would be transplanted on the Project Site. The Project is located on a site with an extensive grove of Mexican fan palms, some queen palms and a few California fan palms. The palms provide little effective shade for the seating area below. Thirteen palms are located within the footprint of the proposed building. Four palms are located in the area of the proposed seating mound. One palm is located in the area where three parking spaces would be created. This adds up to a total of 18 palms to be replaced

with 18 canopy trees. All palms that are not affected by the project would be protected in place.

The proposed Project would be in full compliance with the applicable land use polices of the City of Los Angeles and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	WOULD THE PROJECT CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒

No Impact. As discussed in Section IV(f) above, no such plans presently exist which govern any portion of the Project Site. Furthermore, although the Project Site part of a park site, the park is located in an area which is already developed with residential, commercial, and retail uses, and is also within a heavily urbanized area of the City of Los Angeles. Therefore the proposed Project would not have the potential to cause such effects and there would be no impact.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII.	**MINERAL RESOURCES.** Would the Project:				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	❑	☒

No Impact. Because the Project Site is subject to the applicable land use and zoning requirements in the General Plan and LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), the Project is subject to development standards for the various districts in the City of Los Angeles. The Project Site is not zoned for oil extraction and drilling or mining of mineral resources, and there are no such operations at the Project Site.[47] The Project Site is not located within an identified Mineral Resource Zone (MRZ) as determined by the California Division of Mines and Geology (CDMG) or as designated by the Conservation Element of the City of Los Angeles General Plan, or within an "O" (Oil Drilling) District. Therefore, Project development would not result in the loss or non-availability of any known, regionally valuable mineral resource, and no further analysis of this issue is required.

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[47] City of Los Angeles Department of City Planning, Parcel Profile Report, 2820 W 6th Street and 625 S La Fayette Park Place, website: www.zimas.lacity.org, accessed April 2017.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	❑	❑	❑	☒

No Impact. As discussed above, development of the proposed 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. Thus, no impact associated with mineral resources would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII.	**NOISE.** Would the Project result in:				
a.	WOULD THE PROJECT RESULT IN EXPOSURE OF PERSONS TO OR GENERATION OF NOISE LEVELS IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	❑	❑	☒	❑

Less Than Significant Impact. 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 111.00 through Section 116.01 of the LAMC, and LAMC Section 41.40. Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below.

Construction Noise

Construction-related noise impacts would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Additionally, as defined in the L.A. CEQA Thresholds Guide threshold for construction noise impacts, a significant impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location.

Furthermore, the L.A. CEQA Thresholds Guide also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

Construction of the Project would require the use of heavy equipment for grading, excavation and foundation preparation, the installation of utilities, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table 8, Noise Range of Typical Construction Equipment, and Table 9, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

Table 8
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet [a]
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88

[a] *Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.*
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

Table 9
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74
Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.				

The noise levels shown in Table 9 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table 9, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor. Construction activities associated with the Project would be expected to occur and generate noise at off-site locations consistent with the estimates provided in Table 9.

The nearest sensitive receptors that could potentially be subject to noise impacts associated with construction of the Project include the following (also see Figure 4, Location of Sensitive Receptors, above):

1. Senior Citizens Center, 90 feet southeast of the Project Site;
2. Larchmont Charter School at La Fayette Park, 2801 West 6th Street, approximately 230 feet northwest of the Project Site;
3. Pilgrim School, 540 Commonwealth Avenue; 540 feet northwest of the Project Site;
4. LASR Charter School, 520 South La Fayette Park Place, 300 feet north of the Project Site;
5. McAlister High School, 611 South Carondelet Street, 970 feet east of the Project Site;
6. Charles White Elementary School, 2401 Wilshire Boulevard, 1,230 feet east of the Project Site;
7. Newton International College, 2975 Wilshire Boulevard, 780 feet west of the Project Site;

8. Medical office buildings at 500 and 520 South Virgil Avenue, as close as 960 feet northwest of the Project Site.

According to LAMC 111.03, "presumed ambient noise levels" in C2 zones are 60 dB(A) during the day and 55 dB(A) at night and 50 dB(A) during the day and 40 dB(A) at night in R4 zones. Due to the use of construction equipment during the construction phase, the Project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to those previously listed above in Table 9. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the Project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., excavation work) would typically be reduced in the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

LAMC Section 41.40 regulates noise from construction activities. Exterior construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Construction activities are prohibited on Sundays and all federal holidays. The construction activities associated with the Project would comply with these LAMC requirements. In addition, pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. According to the LAMC, technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Thus, based on the provisions set forth in LAMC 112.05, implementation of feasible noise attenuation measures would ensure the Project would be consistent with the LAMC and construction noise impacts would be less than significant.

Operational Noise
Upon completion and operation of the Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed for the new structure. The operation of such on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. This impact would be considered less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	❑	❑	☒	❑

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic 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
Construction activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate though the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California

Department of Transportation's (Caltrans) adopted vibration standards for buildings which are used to evaluate potential impacts related to construction. Based on the FTA and Caltrans criteria, construction impacts relative to groundborne vibration would be considered significant if the following were to occur:[48]

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any building that is constructed with reinforced-concrete, steel, or timber;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any engineered concrete and masonry buildings;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings; or
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any historical building or building that is extremely susceptible to vibration damage.

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches. No thresholds have been adopted or recommended for commercial and office uses. Table 10, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that could operate at the Project Site during construction.

Table 10
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.										

With respect to construction vibration impacts upon existing off-site structures, there are

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48 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006; and California Department of Transportation, Transportation- and Construction –Induced Vibration Guidance Manual, June 2004.

no known structures adjacent to the Project Site that would be considered structurally fragile or susceptible to vibration damages. The surrounding buildings consist primarily of engineered concrete and masonry buildings, and reinforced-concrete, steel, or timber buildings. As such, the potential for construction-related vibration damage to off-site structures would be considered low. In addition, the nearest off-site structures are more than 100 feet to the northwest (college use) or more than 125 feet to the west (office use). As shown in Table 10 above, at distances beyond 25 feet from the Project Site boundary, construction related vibration levels would not have the potential to exceed 0.089 PPV. As discussed previously, the most restrictive threshold for building damage from vibration is 0.12 PPV for historic buildings and buildings that are extremely susceptible to vibration damage, and the least restrictive threshold is 0.5 PPV at any building that is constructed with reinforced-concrete, steel, or timber. As maximum off-site vibration levels at existing structures would not have the potential to exceed 0.089 PPV, the Project's construction activities would not exceed the identified thresholds of significance for building damage from vibration and impacts would be less than significant.

Operational Vibration

The Project proposes construction of a three-story, 24,860 square-foot building reaching a maximum height of approximately 42 feet to house extracurricular activities in academics, arts, and athletics. The proposed Project would provide three levels of space for activities, including large and small ensemble rooms for music practice and performances, club rooms for academic and art use, offices, reception area and lobby, and a roof deck. The ground-floor rooms are designed to open to the park with moveable walls for the public to watch performances and interact with the HOLA activities. 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.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑

Less Than Significant Impact. A significant impact may occur if the Project were to

result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. As defined in the City of Los Angeles CEQA Thresholds Guide threshold for operational noise impacts, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. As discussed above, the traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the L.A. CEQA Thresholds Guide, if a Project would result in traffic that is less than double the existing traffic, then the Project's mobile noise impacts can be assumed to be less than significant. The proposed Project would add an arts and recreation center on an existing park. The center anticipates serving students during afternoon weekday hours and all day on Saturdays. This activity also assumes approximately 30 teachers in total serving the center, though not at one time. It is understood based on current use of HOLA's facility adjacent to the park that most participants of the programs offered by HOLA use transit and walk from local schools and housing to HOLA facilities. This type of use would not double the traffic volume on any given roadway in the vicinity of Lafayette Park. Because of the type and size of proposed use, a traffic study was not required by LADOT for the Project. Therefore, potential traffic noise impacts would be less than significant.

Stationary Noise Sources

New stationary sources of noise, such as mechanical HVAC equipment would be installed for the proposed building at the Project Site. As discussed in Question (a) above, the design of this equipment would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. This impact would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑

Less Than Significant Impact. As discussed above, impacts would be less than significant for temporary construction noise and vibration, and periodic operational noise and vibration.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒

No Impact. The nearest airport to the Project Sites is the Santa Monica Municipal Airport, located more than 11 miles to the west. The Project Sites are not located within an airport land use plan or within the vicinity of a private airstrip. As such, the proposed Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒

No Impact. The nearest airport to the Project Sites is the Santa Monica Municipal Airport, located more than 11 miles to the west. The Project Sites are not located within an airport land use plan or within the vicinity of a private airstrip. As such, the proposed Project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the Project:				
a. INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. The proposed Project would not introduce new housing or businesses, and therefore would not induce population growth directly or indirectly. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒

No Impact. The proposed Project would develop a community center on existing park space. No housing is present on the park and therefore no housing would be displaced as a result of Project development. No impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒

No Impact. The proposed Project would develop a community center on existing park space. No housing is present on the park and therefore no housing would be displaced as a result of Project development. Therefore, no people would be displaced as a result of Project development.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. FIRE PROTECTION?	❑	❑	☒	❑

Less Than Significant Impact. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, 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 adequate if a Project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; while for a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. The Project Site is within the service area of LAFD Central Bureau. The proposed Project would be served primarily by Fire Station No. 13, located at 2401 West Pico Boulevard, approximately 1.3 mile south of the Project Site, and Fire Station No. 6, located at 326 North Virgil Avenue. Each of these stations include 12 team members, one ladder truck, two engines, and a paramedic ambulance. Under LAMC criteria, the existing fire response distance to the Project would be adequate.

Pursuant to LAMC Section 57.09.06, City-established fire flow requirements vary from 2,000 gallons per minute (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.[49] 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. The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Additional fire hydrants may be required, depending on the building design and LAFD requirements. Such improvements would be conducted 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 in short duration and

[49] LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.06.

would not result in any significant environmental impacts. Approval of this plot plan, and implementation of the Project design features, would ensure the impact on fire protection would be less than significant and no mitigation measures are required.

Since the proposed Project would be within a 1.5 mile fire response distance, provide adequate fire flow and access, and meet building fire safety regulations, impacts with respect to fire services would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
b. POLICE PROTECTION?	❑	❑	☒	❑

Less Than Significant Impact. For the purpose of this Initial Study, 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. Based on the City of Los Angeles *L.A. CEQA Thresholds Guide 2006*, the determination of whether a Project results in a significant impact on police protection shall be made considering the following factors:

- The population increase resulting from a Project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of Project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and a Project's proportional contribution to the demand; and
- Whether a Project includes security and/or design features that would reduce the demand for police services.

The proposed Project would be served by the LAPD Olympic Community Police Station located at 1130 South Vermont Avenue, approximately 1.2 miles southeast of the Project Site. The Project Site is within the Reporting District 2029. The Olympic Community Police Station, which is under the jurisdiction of the West Bureau, serves a community area encompassing 8.5 square miles, including the Project Site, and contains a population of approximately 300,000.[50] For the purposes of the LAPD, the Olympic Community service boundaries are roughly defined as: Melrose Avenue and Beverly Boulevard to the North; the Santa Monica Freeway to the South; Wilton Place,

[50] LAPD website: http://www.lapdonline.org/olympic_community_police_station/, accessed April 2017.

Crenshaw Boulevard, Plymouth Boulevard and Gower Street to the West; and Hoover Street to the East.

Implementation of the proposed Project would result in an increase of site employees and visitors within the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. The demand for police services is based on residential population, and the proposed Project would not result in additional residents on the Project Site, as the Project does not include housing. Therefore, the Project would not require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Additionally, the proposed Project would be subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, the new building will add an active component to a corner of the park previously identified by LAPD as one that was challenging to maintain in a safe manner. And, by enhancing safety and security in this portion of the park, the safety of the overall park, and the surrounding community, would be achieved. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
c. SCHOOLS?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. The proposed Project would not introduce new housing or businesses, and therefore would not induce population growth directly or indirectly. Thus, would not increase demand for school services that could create capacity or service level problems or require new or expanded school facilities. Rather, the proposed facility would accommodate students currently served by local schools during after-school and weekend hours. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. PARKS?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. Rather than create increased demand which could result in the need for additional park facilities in the City, the proposed Project consists of enhancing an existing area of the park with the addition of a new facility to create additional opportunities for patrons within the park. The proposed building would be located on a portion of the park currently improved with picnic tables and palm trees.

The construction of this building would enhance this specific area as well as the overall recreation area, by providing additional programming opportunities to the park. The building will provide new, state-of-the-art facilities while utilizing the existing park and its resources such as the library and skate park, to enhance the site and add new active and safe space for neighborhood families.

The remainder of the park space will benefit from this building as the Project will redistribute the existing picnic tables throughout the park, providing better engagement and activation between of families and the existing recreational opportunities. As well as, the current palm trees, which provide little to no shade, will be replaced with trees that provide a substantial shade canopy. Further enhancing areas that are presently ignored by families looking to utilize the park space.

The addition of the proposed building would add a new variety of activities and opportunities to the existing recreation area. And, the Project assists with the greater vision of the park in adding better linkages between picnicking families and the active recreational opportunities offered.

The new building will be built in accordance with current building standards, including accessibility, security, and lighting. The new building will add an active component to a corner of the park previously identified by LAPD as one that was challenging to maintain in a safe manner. And, by enhancing safety and security in this portion of the park, the safety of the overall park, and the surrounding community, will be achieved.

Therefore, the proposed Project would not result in physical impacts, as evidenced in this Initial Study/Negative Declaration associated with the provision of new governmental facilities such as parks. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
e. OTHER PUBLIC FACILITIES?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. The existing park also contains the Felipe de Neve Branch Library of the Los Angeles Public Library system. Rather than create increased demand which could result in the need for additional library facilities in the City, the proposed Project consists of enhancing an existing area of the park with the addition of a new facility to create additional opportunities for patrons within the park. Although the Project could encourage use of the park by additional patrons, the proposed Project would not result in increased population in the area, directly or indirectly, but rather serves to accommodate patrons and visitors in the local area. For this reason, the Project would not result in increased demand of the existing library which could result in physical impacts associated with the provision of new or physically altered governmental facilities such as libraries. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a. WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	❑	❑	☒	❑

Less Than Significant Impact. The park currently contains the following recreation amenities: community building/recreation center, basket courts, children's play area, tennis courts, and play fields.

The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. Rather than create increased use of the park, which could result in the physical deterioration of the park, the proposed Project consists of enhancing an existing area of the park with the addition of a new facility to create additional opportunities for patrons within the park in new and upgraded facilities and open space areas. The proposed building will be located on a portion of the park currently improved

with picnic tables and palm trees. Given its current layout, this portion of the park does not have the necessary space required to provide meaningful active recreational opportunities. And given the number of picnic tables currently located in this area, this portion of the park allows for a minimal amount of landscape and tree canopy.

The construction of the proposed building would enhance this specific area as well as the overall recreation area, by providing additional programming opportunities to the park. The building will provide new, state-of-the-art facilities for HOLA's extracurricular activities, reaching underserved youth in the immediate community while utilizing the existing park and its resources such as the library and skate park, to enhance the site and add new active and safe space for neighborhood families.

The remainder of the park space will benefit from this building as the Project will redistribute the existing picnic tables throughout the park, providing better engagement and activation between of families and the existing recreational opportunities. As well as, the current palm trees, which provide little to no shade, will be replaced with trees that provide a substantial shade canopy. Further enhancing areas that are presently ignored by families looking to utilize the park space.

The addition of the proposed building would add a new variety of activities and opportunities to the existing recreation area. And, the Project assists with the greater vision of the park in adding better linkages between picnicking families and the active recreational opportunities offered.

The new building will be built in accordance with current building standards, including accessibility, security, and lighting. The new building will add an active component to a corner of the park previously identified by LAPD as one that was challenging to maintain in a safe manner. And, by enhacing safety and security in this portion of the park, the safety of the overall park, and the surrounding community, will be achieved.

Therefore, the proposed Project would not result in physical impacts, as evidenced in this Initial Study/Negative Declaration associated with the provision of new governmental facilities such as parks. Impacts would be less than significant.

The proposed Project is an expansion of recreational facilities. Because the Project would satisfy some of the local demand for recreation, it has the potential to decrease the demand for other recreational facilities in the area. The nearest existing park, MacArthur Park, is located less than 1/2 mile east of the proposed Project. The proposed Project would not result in an increase in use of any other existing neighborhood or regional park or other recreation facility such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. As discussed above, the Project includes the construction of a new facility within an existing community park. As evidenced in this Initial Study/Negative Declaration, the proposed Project would not result in physical impacts associated with the provision of new governmental facilities such as parks. Additionally, because the Project would satisfy some of the local demand for recreation, it has the potential to decrease the demand for other recreational facilities in the area. The nearest existing park, MacArthur Park, is located less than 1/2 mile east of the proposed Project. Thus, the proposed Project would not result in physical impacts associated with the provision of new governmental facilities such as parks. Therefore, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII.	**TRANSPORTATION/CIRCULATION. Would the Project:**				
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. The Project Site is located on the west side of S. La Fayette Park Place, south of 6th Street and is currently in use as a passive recreation area within La Fayette Park.

Construction Traffic Impacts

Construction activities associated with the Project would be undertaken in three main phases: (1) removal of existing uses (picnic tables and benches, pavement), (2) excavation/grading/foundation preparation, and (3) construction of the building and site amenities. The Project proposes to use prefabricated structures, and would therefore

require a total construction period of approximately nine (9) months.

The Project applicant would be required to submit formal construction staging and traffic control plans for review and approval by the local agency prior to the issuance of any construction permits. A Work Area Traffic Control Plan will be developed for use during the entire construction period. This plan will also incorporate safety measures around the construction site to reduce the risk to pedestrian traffic near the work area. The Work Area Traffic Control Plan will identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. Construction equipment and worker cars will generally be contained on-site. At times when on-site staging and parking is not available, a secondary staging area will be required. The Work Area Traffic Control Plan would minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians. The Plan includes access restrictions, covered sidewalks, and designating alternative pedestrian routes. The Project applicant would develop and implement an approved Work Area Traffic Control plan including a designated haul route, staging area, and traffic control procedures to mitigate the traffic impacts during construction. With approval of the haul route and Work Area Traffic Control plan, impacts associated with the construction activities would be less than significant.

Operational Traffic Impacts

The proposed use would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. Wilshire Boulevard is a designated Major Highway. Sixth Street is a designated Secondary Highway. Commonwealth Avenue is a designated Collector Street. La Fayette Park Place is a designated Local Street. The proposed Project replaces an existing HOLA facility immediately across South La Fayette Park Place. The relocation of participants from one side of the street to another does not alter or impact the current traffic patterns associated with the immediate area and as such should not increase the amount of cars currently utilizing the street system. In addition, the recreation center is designed to serve the community. Many users would walk, bike, or use public transit. As documented by LADOT in their Traffic Study Assessment, a traffic study is not needed for projects requesting deviations from yard, height or parking restrictions outlined in the Municipal Code. Development of the Project, which includes the addition of an arts and recreation center on an existing park, would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT	❑	❑	☒	❑

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. The Congestion Management Program (CMP) is a state-mandated program that was enacted by the California State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system. The CMP Traffic Impact Analysis guidelines require that intersection monitoring locations must be examined if the Project will add 50 or more trips during either the AM or PM weekday peak hours. The proposed Project would not add 50 or more trips during the AM or PM peak hours at any CMP monitoring location. The proposed Project is not open during the AM peak hour, and is relocating existing trips from an existing facility immediately across South La Fayette Park Place. The relocation of participants from one side of the street to another does not increase the amount of cars currently utilizing the street system. Therefore, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	❑	❑	❑	☒

No Impact. The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	❑	❑	☒

No Impact. The proposed Project would not include any new roads that would result in a substantial increase in hazards due to a design feature. Vehicular access to the existing site is currently provided via South La Fayette Park Place. Development of the Project does not propose to change the existing vehicular access or parking location and therefore would not substantially increase hazards due to a design feature. Thus, no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	❑	❑	☒	❑

Less Than Significant Impact. As previously discussed above, the proposed Project is not located on or near an adopted emergency response or evacuation plan route. Emergency access to the Project Site would be provided by the existing and proposed street system. The proposed Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access. Furthermore, as described in Section XV (a), the proposed Project would satisfy the emergency response requirements of the LAFD, and as discussed in Section XVII (d), there are no hazardous design features included in the access design or site plan for the proposed Project that could impede emergency access. The proposed Project would not result in any changes or alterations to access roads or driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the proposed Project would not be expected to result in inadequate emergency access, and the proposed Project would have a less than significant impact on emergency access.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project would be designed to be supportive of alternative forms of transportation and is expected to increase rather than decrease the safety or performance of transit, bicycle, and pedestrian facilities. Public bus/rail transit service within the Project area is currently provided by Los Angeles County Metropolitan Transit Authority (Metro), the City of Los Angeles Department of Transportation (DASH), and Foothill Transit. Several MTA and LADOT bus routes have

stops within reasonable walking distance (one-quarter of a mile) of the Project Site. Further, the MTA operates Metro Rapid Bus lines along Wilshire Boulevard and the Project Site is approximately 0.6 miles from the Westlake / MacArthur Park Red Line Station. Including transfer opportunities, the Project is very well served by public transit. Thus, it is expected that many of the trips generated by the Project will utilize public transportation as their primary travel mode instead of private vehicles. Since the proposed Project would not modify or conflict with any alternative transportation policies, plans or programs, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII.	**TRIBAL CULTURAL RESOURCES**				
a.	LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K)?	❑	❑	☒	❑

Less Than Significant Impact. As discussed above under V(a), the proposed Project does not involve the demolition, destruction, relocation, or alteration of any historical resources. The Project does not include demolition or rehabilitation of any structures, including structures that are historical resources defined by CEQA. As discussed above, the Project would have no direct or indirect impacts on historical resources. Accordingly, impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT, PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1? IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.	❑	❑	☒	❑

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to Projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a

Project with an effect that may cause a substantial adverse change in the significance of a TCR is a Project that may have a significant effect on the environment. To help determine whether a Project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a Project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a Project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. 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. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the Project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, the City of Los Angeles Department of Recreation and Parks provided notice to tribes soliciting requests for consultation on April 21, 2017, and this 30-day notification period ends May 21, 2017. As previously discussed under Question V(b), the Project Site does not contain any known archaeological sites or archaeological survey areas. As discussed above in Section V(a), Lafayette Park was determined eligible for listing under Criterion A/1 of the National Register as a public park associated with the westward expansion of Los Angeles in the late 19th century. According to National Park Service guidance, a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person.[51] Although the park's landscape design, features and materials have been substantially altered, it retains its original boundaries and remains a public park composed primarily of landscaped, recreational open space. After construction of the Project, the majority of Lafayette Park's nearly ten acres will remain

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[51] National Register Bulletin 15, 46.

a public park consisting primarily of recreational open space. The park will therefore retain sufficient integrity to convey its significance under Criterion A/1. The Felipe de Neve Branch Library will remain unaltered. The integrity and significance of both resources will therefore remain materially unimpaired by the proposed new construction and impacts would be less than significant.

Furthermore, due to the lack of substantial evidence in City and NAHC databases or resultant from the AB 52 process demonstrating otherwise, the City of Los Angeles Department of Recreation and Parks, as lead agency, has determined the Project Site is not a TCR as defined by PRC Section 21074. Nonetheless, so as to ensure any unforeseen and inadvertent discovery of TCRs would not result in a potentially significant impact, 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. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES. Would the Project:				
a. EXCEED WASTEWATER TREATMENT REQUIREMENTS OF EITHER THE LOS ANGELES OR LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	❑	☒

No Impact. For the purpose of this Initial Study, a significant impact may occur if a Project would discharge wastewater, whose content exceeds the regulatory limits established by the governing agency. This question would typically apply to properties served by private sewage disposal systems, such as septic tanks. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate Regional Water Quality Control Board (RWQCB). The RWQCB then authorizes a NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

The Los Angeles RWQCB enforces wastewater treatment and discharge requirements for properties in the Project area. The proposed Project would convey wastewater via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Treatment Plant (HTP). The HTP is a public facility, and, therefore, is subject to the state's wastewater treatment requirements. As such, wastewater from the implementation of the proposed Project at the Project Site would be treated according to the wastewater treatment requirements enforced by the Los Angeles RWQCB, and no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	CREATE WATER OR WASTEWATER SYSTEM CAPACITY PROBLEMS, OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑

Less Than Significant Impact.

Water Treatment Facilities and Existing Infrastructure

The City of Los Angeles Department of Water and Power (LADWP) currently supplies water to the Project Site. The LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved.

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 362 mgd averaged over calendar year 2013, and operates at approximately 60 percent capacity. Therefore, the LAAFP has a remaining capacity of approximately 238 mgd, depending on the season.[52]

State of California Senate Bill ("SB") 610 and SB 221 became effective January 1, 2002, amending State Water Code Sections 10910-10915, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development Projects. These statutes require that cities and counties obtain from the local water supplier written assessment or verification of the sufficiency of water supply to serve proposed large development Projects in their jurisdiction through a Water Supply Assessment ("WSA"). Pursuant to SB 610, Projects that are required to obtain a WSA include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;

[52] Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, adopted July 1, 2016.

- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- a mixed-use Project that falls in one or more of the above-identified categories; or
- a Project not falling in one of the above-identified categories but that would demand water equal or greater to a 500 dwelling-unit Project.

The Project would not meet or exceed the threshold for a preparation of a Water Supply Assessment. Additionally, implementation of the proposed Project is not expected to measurably reduce the LAAFP's capacity; therefore, no new or expanded water treatment facilities would be required. Therefore, with respect to water treatment facilities, impacts would be less than significant.

However, if water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed either by the applicant or by LADWP, and a temporary disruption in service may occur. In addition, proper notification to LADWP customers would take place if a disruption in water service were to occur. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant.

Furthermore, the proposed Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. The LADWP's growth Projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat the LADWP's projected water supply, as well as the LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the Projected water demand. Chapter XII of the LAMC comprises the City of Los Angeles Emergency Water Conservation Plan. The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. Additionally, in response to California's extreme drought, the Mayor's office has mandated actions to reduce per capita potable water use, a reduction in LADWP water purchases, and creation of an integrated water strategy.

At the state level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public

Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use. In summary, the proposed Project's water demand is expected to comprise a very small percentage of LADWP's existing water supplies. As such, no new or expanded water infrastructure would be required to serve the proposed Project and impacts would be less than significant.

In addition to supplying water for domestic uses, the LADWP also supplies water for fire protection services, in accordance with Fire Code. The Project Site is served by existing water lines maintained by LADWP. There are currently no water service problems or deficiencies in the Project area. However, if water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place. Therefore, potential impacts resulting from water infrastructure improvements, if any are required, would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. The existing residential uses have sewer connections to the City's sewer system. Sewage from the Project Site is conveyed via 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 362 mgd, and has capacity to treat 450 mgd. This equals a remaining capacity of 88 mgd of wastewater able to be treated at the HTP.[53]

With respect to wastewater infrastructure, wastewater service is provided to the Project Site by existing sewer lines maintained by the Bureau of Sanitation. Sewer infrastructure in the vicinity of the Project Site includes an existing 20-inch line in S La Fayette Park Place. A Sewer Capacity Availability Request (SCAR) for the Project was approved by the Bureau of Sanitation on April 3, 2017 which indicates that sufficient hydrological capacity is available in the local sewer system to handle the anticipated sewer discharge from the Project, and the determination is valid for 180 days from the date shown on the SCAR.[54] As such, no new or expanded wastewater infrastructure would be required to serve the proposed Project, and impacts would be less than significant.

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

[53] City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: http://san.lacity.org/lasewers/treatment_plants/hyperion/index.htm.

[54] City of Los Angeles, Department of Public Works, Bureau of Sanitation, April 3, 2017, Sewer Availability and Scar Request Number 61-3606-0317.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	WOULD THE PROJECT REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORM WATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	❑	☒

No Impact. As described in Section VII(c), the proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site. In keeping with the Low Impact Development (LID) standards, the Project would be required to incorporate measures to capture stormwater on the site, and there would be no increase in runoff from the site. Therefore, the proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, and no impact would occur.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	❑	☒	❑

Less Than Significant Impact. The City's water supply primarily comes from the Los Angeles Aqueducts, groundwater, State Water Project (supplied by the Metropolitan Water District of Southern California [MWD]), and from the Colorado River (supplied by MWD). MWD uses a land use based planning tool that allocates Projected demographic data from SCAG into water service areas for each of MWD's member agencies. MWD's demographic Projections use data reported in SCAG's 2012-2035 RTP/SCS. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. LADWP's 2015 Urban Water Management Plan (UWMP) Projects a supply of 642,400 AF/Y in 2020, 676,900 AF/Y in 2025, and 709,500 AF/Y in 2040. With LADWP's current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. 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.

Because of the small size of the Project, is anticipated that the Project would not create any water system capacity issues, and there would be sufficient reliable water supplies available to meet Project demands. Therefore, the Project would have a less than

significant impact related to water demand.

Department of Water and Power's most current water management plan indicates that a sufficient water supply is expected to be available to serve the proposed Project. Sufficient water supplies would be available to serve the proposed Project from existing entitlements and resources, therefore, new or expanded entitlements will not be necessary. The Project will be required to incorporate the Department of Water and Power's water-saving measures, including the City's Water Management Ordinance, which imposes numerous conservation measures for landscaping, and installation and maintenance activities to ensure that the Project would have a less than significant impact on the City's water supply.

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		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	WOULD THE PROJECT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	❑	❑	☒	❑

Less Than Significant Impact. As stated in Question XIX(b), the sewage flow from operation of the Project would ultimately be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the Project. Therefore, impacts would be less than significant and no mitigation measures are required.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑

Less Than Significant Impact. Solid waste generated within the City is disposed of at privately-owned landfill facilities throughout Los Angeles County. As is typical for most solid waste haulers in the greater Los Angeles Area, the hauler would most likely separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. Most commonly, the City is served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including construction and demolition (C&D) waste. Chiquita Canyon Landfill is also a Class III landfill accepting non-hazardous solid waste including construction and demolition waste that serves the area; however, this landfill currently

has a 2-year life expectancy remaining based on 2014 average daily disposal. An expansion of this landfill is currently proposed, which would add an additional 43 years of use based on 2014 average daily disposal rates.[55] Moreover, as of 2014, Azusa Land Reclamation is the only permitted inert (i.e., unclassified and construction and demolition waste which includes earth, rock, concrete rubble, asphalt paving fragments, etc.) in Los Angeles County that has a full solid waste facility permit.[56]

Construction Impacts

In order to help meet the landfill diversion goals, the City adopted the Citywide C&D Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible. Moreover, there are 60 million tons of remaining capacity available in Los Angeles County for the disposal of inert waste. Some construction and demolition waste may also be landfilled at the Class III landfill identified above. Therefore, solid waste impacts from construction and demolition activities would be less than significant.

Operational Impacts

Waste generated in the City may also be diverted from landfills and recycled. In 2000, the City had a rate of diversion of approximately 58.8 percent.[57] More recently, the City achieved a landfill diversion rate of 76.4 percent in 2013, which represents the highest recycling rate out of the 10 largest U.S. cities.[58] This landfill diversion rate exceeds the 75 percent diversion mandate by 2020 set forth in AB 374.[59] The Bureau of Sanitation's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.[60] The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste, and helps create markets for recycled materials.[61] Currently, there is adequate landfill capacity for the Project's

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55 Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2014 Annual Report, published December 2015, website: http://dpw.lacounty.gov/landing/wasteManagement.cfm, accessed: June 2016.

56 Ibid.

57 Los Angeles Bureau of Sanitation, AB 939 Year 2000 Report, page ES-1, website: http://www.lacitysan.org/solid_resources/pdfs/ab939y2000.pdf/, accessed: April 2016.

58 Los Angeles Bureau of Sanitation, Solid Resources, Recycling, website: http://lacitysan.org/solid_resources/recycling/, accessed: April 2016.

59 California Department of Resources and Recycling, California's 75 Percent Initiative, website: http://www.calrecycle.ca.gov/75percent/, accessed: April 2016.

60 Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: April 2016.

61 *Ibid.*

operational demand. Therefore, solid waste impacts from operation of the Project would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project would generate solid waste that is typical of a recreational/institutional use and would be consistent with all federal, state, and local statutes and regulations regarding proper disposal. The Project will be required to provide on-site recycling to reduce the amount of trash going to landfills. This will reduce the solid waste impact to a less than significant level.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF A FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	❑	❑	☒	❑

Less Than Significant Impact. The proposed Project is located in a densely populated urban area and would have no significant impacts with respect to biological resources or cultural resources. The proposed 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.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	DOES THE PROJECT HAVE IMPACTS THAT ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY	❑	❑	☒	❑

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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. As concluded and analyzed in this report, the proposed Project's incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities would be less than significant. As such, the proposed Project's contribution to cumulative impacts would be less than significant.

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	❑	❑	☒	❑

Less Than Significant Impact. For the purpose of this Initial Study, a significant impact may occur if a Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the proposed Project would not have significant environmental effects on human beings, either directly or indirectly.

RESPONSE TO COMMENTS

INTRODUCTION

Comments received during the 20-day public comment period for the Draft Initial Study and Negative Declaration, ending May 23, 2017, included public comments and responses from 2 petitions circulated in the community around the project site at Lafayette Park.

FORMAT OF THE RESPONSE TO COMMENTS

Comments received on the Draft EIR are organized by the type of commenter, including agencies companies, organizations, and individuals. Presented below are comments in regards to the CEQA environmental analysis. The response to comments list the name of each comment letter or e-mail, with each substantive comment quoted verbatim in italics and individually numbered. Comments not related to the Negative Declaration are not included in the responses to comments.

NEIGHBORS OF MACARTHUR PARK (DIANA GULLIEN) EMAIL #1

Comment 1:

However, we are also concerned that the projections of the "HOLA" service agency call for expanding their programs and projects at the expense of removing spaces from that park, thus depriving many children and youth from having open air areas in an area that has few green spaces.

Response 1:

The Negative Declaration for the Project discussed potential impacts to Recreation facilities, specifically to Lafayette Park itself. The Negative Declaration states:

The proposed Project consists of the addition of a three-story, 24,860 square-foot building to house extracurricular activities in academics, arts, and athletics in the existing park. Rather than create increased use of the park, which could result in the physical deterioration of the park, the proposed Project consists of enhancing an existing area of the park with the addition of a new facility to create additional opportunities for patrons within the park in new and upgraded facilities and open space areas. The proposed building will be located on a portion of the park currently improved with picnic tables and palm trees. Given its current layout, this portion of the park does not have the necessary space required to provide meaningful active recreational opportunities. And given the number of picnic tables currently located in this area, this portion of the park allows for a minimal amount of landscape and tree canopy.

The construction of the proposed building would enhance this specific area as well as the overall recreation area, by providing additional programming opportunities to the park. The building will provide new, state-of-the-art facilities for HOLA's extracurricular activities, reaching underserved youth in the immediate community while utilizing the existing park and its resources such as the library and skate park, to enhance the site and add new active and safe space for neighborhood families.

The remainder of the park space will benefit from this building as the Project will redistribute the existing picnic tables throughout the park, providing better engagement and activation of families and the existing recreational opportunities. Additionally, the current palm trees, which provide little to no shade, will be replaced with trees that provide a substantial shade canopy.

The addition of the proposed building would add a new variety of activities and opportunities to the existing recreation area. And, the Project assists with the greater vision of the park in adding better linkages between picnicking families and the active recreational opportunities offered.

The new building will be built in accordance with current building standards, including accessibility, security, and lighting. The new building will add an active component to a corner of the park previously identified by LAPD as one that was challenging to maintain in a safe manner. And, by enhancing safety and security in this portion of the park, the safety of the overall park, and the surrounding community, will be achieved.

Therefore, the proposed Project would not result in physical impacts, as evidenced in this Initial Study/Negative Declaration associated with the provision of new governmental facilities such as parks. Impacts would be less than significant.

The proposed Project is an expansion of recreational facilities. Because the Project would satisfy some of the local demand for recreation, it has the potential to decrease the demand for other recreational facilities in the area. The nearest existing park, MacArthur Park, is located less than 1/2 mile east of the proposed Project. The proposed Project would not result in an increase in use of any other existing neighborhood or regional park or other recreation facility such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be less than significant.

Comment 2:

As residents, we feel that there have been faults in that process, since the community was not adequately informed and the information was sparse and focused on the users of the programs of said service agency or non-profit called "HOLA."

Response 2:

The proposed project has been presented to numerous community and governmental meetings over the last two (2) years, both informally and via public notice. Procedurally, the following eight (8) meetings were publically noticed by governmental and quasi-governmental agencies. It was presented at the MacArthur Park Neighborhood Council on June 15, 2015, and July 20, 2015. It was presented at the Rampart Neighborhood Village Council on July 21, 2015 and again on October 25, 2015. The project's entitlements (planning approvals) were presented to a Planning Department Hearing Officer on February 15, 2017. All of these meetings were publically noticed and had community members present.

Additionally, the project received conceptual approval from the Board of Recreation and Park Commissioners ("Board") on August 12, 2015. Subsequent presentations to the Board were made on March 15, 2017 and March 22, 2017. All of these meetings were publically noticed and had community members present.

Comment 3:

We see that no thought has been put into the big negative impact to the environment, since they would construct a new building in an area where we currently have an area of trees, called the "small forest."

Response 3:

As discussed in the Negative Declaration, the Project Site currently includes 39 trees – sixteen (16) will be retained and twenty-three (23) will be removed. The Project will preserve all heritage trees on the Project Site. They will be protected in place with other mature canopy trees.

Of the twenty-three trees identified for removal, a total of five (5) are canopy trees. The building footprint displaces three (3) canopy trees, and the required handicapped access ramp displaces two (2) relatively young canopy trees. These five (5) canopy trees will be removed and replaced at a 2:1 ratio.

The remaining trees removed as a part of this project include an extensive grove of palm trees (i.e. Mexican fan, queen palms and a few California fan palms). The palms provide little effective shade for the current seating area below. A total of eighteen (18) Palms will be affected by this project – thirteen (13) palms are located within the footprint of the proposed building, four (4) palms are located in the area of the proposed seating mound, and one (1) palm is located in the expanded parking area. These eighteen (18) Palm trees will be removed and replaced at a 1:1 ratio. They will be replaced with canopy trees selected to enhance the shade canopy of the park. Palms not affected by the Project will be protected in place.

Therefore, once this project is completed, more trees would be located on the site as a result of the Project as compared to existing conditions.

NEIGHBORS OF MACARTHUR PARK (DIANA GULLIEN) EMAIL #2

Comment 1:

That the environmental study does not reflect the serious problem and the impact on ground quality and the natural materials of the subsoil, (such as natural gas, oil, water, methane, etc.)

Response 1:

Geology and Soils impacts were analyzed in Section VII. Geology and Soils, beginning on page 37, of the Negative Declaration. Specifically, a Geotechnical Engineering Investigation was performed for the Project by Geotechnologies, Inc in March of 2016. Additionally, as discussed in the Negative Declaration, no extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general vicinity. All construction would comply with the City of Los Angeles Building Code, which is designed to assure safe construction and includes building foundation requirements appropriate to site conditions, and the recommendations of the approved Geotechnical Engineering Investigation by Geotechnologies, Inc.

During borings conducted by Geotechnologies, Inc, as part of the Geotechnical Engineering Investigation, groundwater seepage was encountered at a depth of 10 and 16.5 feet below ground surface; the historically highest groundwater in the area is approximately 20 feet

beneath the ground surface. Siltstone of the Miocene age Puente Formation is present beneath the site at depths ranging from 33 to 35 feet beneath the existing ground surface. The siltstone bedrock is considered non-water bearing and it is likely that the groundwater seepage encountered is representative of a perched groundwater condition on top of the bedrock and is not representative of the regional groundwater table.

It is anticipated that excavation would occur as part of the Project to remove soils incompatible for supporting construction of the proposed development. However, no subterranean levels are proposed as part of the Project so excavation would not be expected to encounter groundwater. Construction of the proposed Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Engineering Investigation, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

Additionally, the Project Site is located within a "Methane Zone" as designated by Los Angeles Department of Building and Safety (LADBS). Due to the potential environmental risk associated with Methane Zones, a methane investigation was conducted at the Project Site by Methane Specialists on August 19, 2016. The results of the methane investigation is included in the Negative Declaration in Section VIX, Hazards and Hazardous Materials beginning on page 60.

As more extensively discussed in the Negative Declaration, Methane Specialists conducted shallow and multi-depth probe site testing conducted on August 18, and 19, 2016 at the site. Based on LADBS Methane Code Table IA, significant levels of methane were encountered while testing at this site. Thus, according to Table IA, for the Methane Zone, this Project falls under Design Level IV, with less than 2 inches of water-column gas-pressure. Therefore, as per said Methane Code Table IA, this Project does require both passive, and active, methane mitigation systems.

The Project would be required to comply with the methane mitigation systems required for Projects within Design Level IV. With compliance with the existing regulatory measures for Design Level IV, potential impacts from construction in a methane zone would be remediated and impacts would be less than significant.

Comment 2:

That the area to be built on plays the role of a natural lung within a highly contaminated environment, that lacks areas with green and recreation spaces.

Response 2:

Please see Response 1 and Response 3 to email #1, above.

PETITION TO SAVE OUR GREEN SPACES IN LAFAYETTE PARK

Comment 1:

However, we are also concerned that the projections of the "HOLA" service agency call for expanding their programs and projects at the expense of removing spaces from that park, thus depriving many children and youth from having open air areas in an area that has few green spaces.

Response 1:

Please see Response 1 to email #1, above.

Comment 2:

As residents, we feel that there have been faults in that process, since the community was not adequately informed and the information was sparse and focused on the users of the programs of said service agency or non-profit called "HOLA."

Response 2:

Please see Response 2 to email #1, above.

Comment 3:

We see that no thought has been put into the big negative impact to the environment, since they would construct a new building in an area where we currently have an area of trees, called the "small forest."

Response 3:

Please see Response 3 to email #1, above.

WASTEWATER ENGINEERING SERVICES DIVISION (LA SANITATION) LETTER - JUNE 5, 2017

Comment 1:

The sewer infrastructure in the vicinity of the proposed project includes an existing 10-inch line on Wilshire Blvd R/W. The sewage from the existing 10-inch line feeds into a 15-inch line on Westmoreland Ave before discharging into a 57-inch sewer line on James M Wood Blvd. Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project.

Response 1:

This comment is consistent with the analysis in Section XIX, Utilities, of the Negative Declaration and as stated, the Wastewater Engineering Services Division of LA Sanitation has determined that the project can be served by existing sewer infrastructure.

Comment 2:

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles, we anticipate the following requirements would apply to this project – Post-Construction Mitigation Requirements, Green Streets, Construction Requirements.

Response 2:

As discussed in the Negative Declaration, the project will comply with all relevant codes and regulations.

Comment 3:

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4).

Response 3:

As discussed in the Negative Declaration, the Project would not require direct additions or withdrawals of groundwater. During borings conducted by Geotechnologies, Inc, as part of the Geotechnical Engineering Investigation, groundwater seepage was encountered at a depth of 10 and 16.5 feet below ground surface; the historically highest groundwater in the area is approximately 20 feet beneath the ground surface. Siltstone of the Miocene age Puente Formation is present beneath the site at depths ranging from 33 to 35 feet beneath the existing ground surface. The siltstone bedrock is considered non-water bearing and it is likely that the groundwater seepage encountered is representative of a perched groundwater condition on top of the bedrock and is not representative of the regional groundwater table.

It is anticipated that excavation would occur as part of the Project to remove soils incompatible for supporting construction of the proposed development. However, no subterranean levels are proposed as part of the Project so excavation would not be expected to encounter groundwater. Construction of the proposed Project would be required to comply with the City of Los Angeles UBC and the 2010 California Building Code. With compliance with existing regulations, implementation of all site-specific requirements identified in the Geotechnical Engineering Investigation, impacts associated with the depletion of groundwater supplies or interference with groundwater recharge would be less than significant. Even so, the Applicant will consider the noted conservation measure should any groundwater be encountered.

Comment 4:

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent of more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities.

Response 4:

The Applicant will comply with this requirement and will provide an area for on-site recycling.

Memorando

A: **Departamento de Recreación y Parques de la Ciudad de Los Ángeles**

De: **EcoTierra Consulting**

Fecha: 13 de junio de 2017

Asunto: Respuesta a las cartas de comentarios sobre la Declaración negativa del centro Heart of Los Angeles Arts and Recreation Center.

EcoTierra ha recibido cuatro cartas enviadas al Departamento de Recreación y Parques de la Ciudad de Los Ángeles: dos correos electrónicos enviados por Diana Gullien en representación de los Vecinos de MacArthur Park con fecha de 23 de mayo de 2017; una Solicitud para proteger nuestros espacios verdes en Lafayette Park presentada en la oficina del distrito concejal N.° 10 el 27 de abril de 2017, y una carta de la División de Servicios de Ingeniería de Aguas Residuales de la Oficina de Saneamiento de Los Ángeles con fecha de 5 de junio de 2017.

A continuación se incluyen las respuestas a los comentarios realizados en las cartas de comentarios respecto de la Declaración negativa del proyecto que se difundió para someterla a la opinión pública desde el 4 hasta el 23 de mayo de 2017. Los comentarios realizados respecto del análisis de la Ley de Calidad Ambiental de California (CEQA, *California Environmental Quality Act*) del proyecto se analizan y responden a continuación. Los comentarios que no se relacionen con la Declaración negativa quedan excluidos de las respuestas a los comentarios.

CORREO ELECTRÓNICO N.° 1 DE VECINOS DE MACARTHUR PARK (DIANA GULLIEN)

Comentario 1:

Sin embargo también nos preocupa que las proyecciones de la agencia de servicios "HOLA" quiera expander sus programas y proyecto a costa de quitar espacios a dicho parque, privando con ello que muchos niños y jóvenes puedan tener un espacio de oxígeno en una zona escasa de zonas verdes.

Respuesta 1:

La Declaración negativa del proyecto analizaba los posibles impactos en las instalaciones de recreación, específicamente el mismísimo Lafayette Park. La Declaración negativa establece:

> El Proyecto propuesto consiste en la adición de un edificio de tres pisos con una superficie de 24.860 pies cuadrados que albergará actividades extracurriculares académicas, artísticas y deportivas en el parque existente. En lugar de generar un mayor uso del parque, que podría dar lugar a su deterioro físico, el Proyecto propuesto consiste en mejorar un área existente del parque con la incorporación de una nueva instalación a fin de generar más oportunidades para los usuarios dentro del parque en instalaciones nuevas y mejoradas y áreas de espacio abierto. El edificio propuesto se ubicará en una parte del parque actualmente mejorada con mesas para picnic y palmeras. Dada su distribución actual, esta parte del parque no cuenta con el espacio necesario requerido para ofrecer oportunidades recreativas activas y significativas. Además, debido a la cantidad de mesas para picnic actualmente ubicadas dentro de esta área, esta parte del parque ofrece muy poco paisaje o protección de la copa de los árboles.

La construcción del edificio propuesto mejoraría esta área específica, así como el área recreativa general, al brindar oportunidades adicionales de programación al parque. El edificio ofrecería instalaciones nuevas y de última generación para desarrollar las actividades extracurriculares de HOLA, que alcanzarán a los jóvenes desfavorecidos de la comunidad cercana y, a la vez, utilizarán el parque existente y sus recursos, como la biblioteca y la pista para patinetas, para mejorar el lugar y añadir un nuevo espacio activo y seguro para las familias del barrio.

El resto del espacio del parque se beneficiará con este edificio, ya que el Proyecto redistribuirá las mesas para picnic existentes a lo largo de todo el parque, lo que permitirá una mayor participación y activación entre las familias y las oportunidades recreativas existentes. Además, se reemplazarán las palmeras existentes, que brindan muy poca o nada de sombra, por árboles cuyas copas ofrezcan abundante sombra.

La incorporación del edificio propuesto añadiría una nueva variedad de actividades y oportunidades al área recreativa existente. Asimismo, el Proyecto ayuda con la visión más importante del parque al sumar una mejor conexión entre las familias que disfrutan de un picnic y las oportunidades recreativas activas ofrecidas.

El nuevo edificio se construirá de acuerdo con las normas de edificación, incluidas la accesibilidad, seguridad e iluminación. El nuevo edificio sumará un componente activo a un rincón del parque que, según indicó anteriormente el Departamento de Policía de Los Ángeles, representaba un desafío para mantenerlo seguro. Además, al mejorar la seguridad y la protección dentro de esta parte del parque, se logrará la seguridad general del parque y de la comunidad que lo rodea.

Por lo tanto, el Proyecto propuesto no ocasionaría impactos físicos, tal como se evidencia en este Estudio inicial/Declaración negativa relacionados con el suministro de nuevas instalaciones gubernamentales, como parques. Los impactos serían menos que significativos.

El Proyecto propuesto es una ampliación de las instalaciones recreativas. Como el Proyecto satisfacería algunas de las demandas locales de recreación, tiene el potencial para disminuir la demanda de otras instalaciones recreativas dentro del área. El parque existente más cercano, MacArthur Park, se encuentra a menos de media milla al este del Proyecto propuesto. El Proyecto propuesto no daría lugar a un mayor uso de cualquier parque barrial o regional existente o de otra instalación recreativa de modo tal que se produciría o aceleraría un importante deterioro físico de la instalación. Por lo tanto, los impactos serían menos que significativos.

Comentario 2:

Que como vecinos, sentimos que ha existido vicios en dicho proceso, ya que la comunidad no fue debidamente informada y la informacion fue escasa y enfocada en personas usuarias de programas de dicha agencia de servicio o non profit de nombre "HOLA."

Respuesta 2:

El proyecto propuesto se ha presentado ante varias asambleas comunales y gubernamentales en los últimos dos (2) años, tanto de forma informal como a través de anuncios públicos. En materia de

procedimientos, las agencias gubernamentales y cuasi gubernamentales anunciaron públicamente las ocho (8) asambleas enumeradas a continuación. Se presentó en el Consejo Barrial MacArthur Park el 15 de junio de 2015 y el 20 de julio del mismo año. Se presentó en el Consejo Barrial de Rampart Village el 21 de julio de 2015 y nuevamente el 25 de octubre del mismo año. Las autorizaciones del proyecto (aprobaciones de los planos) se presentaron ante un funcionario de audiencias del Departamento de Planificación el 15 de febrero de 2017. Todas estas asambleas se anunciaron públicamente y en ellas estuvieron presentes miembros de la comunidad.

Además, el proyecto recibió la aprobación conceptual de la Junta de Comisionados de Recreación y Parques ("Junta") el 12 de agosto de 2015. Se realizaron presentaciones posteriores ante la Junta el 15 de marzo de 2017 y el 22 de marzo del mismo año. Todas estas asambleas se anunciaron públicamente y en ellas estuvieron presentes miembros de la comunidad.

Comentario 3:

Que vemos no ha reflexionada sobre el alto impacto negativo en el medio ambiente, ya que se construiría un nuevo edificio en donde actualmente se encuentra una zona de arboles, llamada el "pequeño bosquecillo."

Respuesta 3:

Tal como se analizó en la Declaración negativa, el Lugar del proyecto incluye actualmente 39 árboles: se conservarán dieciséis (16) de ellos y se removerán veintitrés (23). El Proyecto preservará los árboles históricos en el Lugar del proyecto. Se los protegerá en el lugar junto con otros árboles maduros con copa frondosa.

De los veintitrés árboles marcados para remover, un total de cinco (5) son árboles con copas frondosas. La huella del edificio desplaza tres (3) árboles con copas frondosas, mientras que la rampa obligatoria de acceso para discapacitados desplaza dos (2) árboles relativamente jóvenes con copas frondosas. Estos cinco (5) árboles con copas frondosas se removerán y reemplazarán según una relación de 2 a 1.

Entre los restantes árboles removidos como parte de este proyecto se incluye un palmar extenso (es decir, palmeras mexicanas, palmeras pindó y unas cuantas palmeras californianas). Las palmeras ofrecen muy poca sombra efectiva a la actual área de asientos ubicados debajo de ellas. Este proyecto afectará a un total de dieciocho (18) palmeras: trece (13) de ellas se encuentran dentro de la huella del edificio propuesto, otras cuatro (4) se encuentran dentro del área del montículo donde se colocarán los asientos propuestos y una (1) de ellas se encuentra en el área ampliada de estacionamiento. Estas dieciocho (18) palmeras se removerán y reemplazarán según una relación de 1 a 1. Se las reemplazará con árboles de copas frondosas seleccionados para mejorar la sombra de la canopia del parque. Se protegerán en el lugar a las palmeras afectadas por el Proyecto.

Por lo tanto, una vez finalizado este proyecto, habría más árboles en el lugar como resultado del Proyecto, en comparación con las condiciones actuales.

CORREO ELECTRÓNICO N.° 2 DE LOS VECINOS DE MACARTHUR PARK (DIANA GULLIEN)

Comentario 1:

Que el estudio medioambiental no refleja el grave problema e impacto en la calidad del suelo y los materiales naturales del subsuelo, (como es gas, natural, petróleo, agua, metano etc.).

Respuesta 1:

Se analizaron los impactos de Geología y suelos en la sección VII, Geología y suelos, que comienza en la página 37, de la Declaración negativa. Específicamente, Geotechnologies, Inc. realizó una Investigación de ingeniería geotécnica en marzo de 2016. Adicionalmente, tal como se analizó en la Declaración negativa, no se realiza ni se planea realizar la extracción de agua subterránea, gas, petróleo u otra energía geotérmica en el lugar o en la cercanía general. Toda construcción cumpliría con el Código de Edificación de la Ciudad de Los Ángeles, que está diseñado para garantizar una construcción segura e incluye los requisitos para los cimientos de edificios que son apropiados para las condiciones del lugar, además de las recomendaciones de la Investigación de ingeniería geotécnica aprobada por Geotechnologies, Inc.

Durante las perforaciones realizadas por Geotechnologies, Inc., como parte de la Investigación de ingeniería geotécnica, se encontraron filtraciones de agua subterránea a una profundidad de entre 10 y 16,5 pies por debajo de la superficie terrestre; el mayor nivel histórico alcanzado por el agua subterránea en el área es de aproximadamente 20 pies por debajo de la superficie terrestre. Hay presencia de limonita de la Formación Puente de la era del Mioceno debajo del lugar, a una profundidad del rango de entre 33 y 35 pies por debajo de la superficie terrestre existente. Se considera que el lecho rocoso de limonita no contiene agua y que posiblemente la filtración de agua subterránea que se encontró sea representativa de una condición de agua subterránea colgada sobre el lecho rocoso que no representa al nivel freático regional.

Se prevé realizar una excavación como parte del Proyecto para remover los suelos incompatibles y así servir como sustento para la construcción del desarrollo propuesto. Sin embargo, no se propone ningún nivel subterráneo como parte del Proyecto, por lo que no está previsto encontrar agua subterránea a partir de la excavación. La construcción del Proyecto propuesto deberá cumplir con el Código Uniforme de Edificación (UBC, *Uniform Building Code*) de la Ciudad de Los Ángeles y el Código de Edificación de California de 2010. En cumplimiento de las reglamentaciones actuales y con la implementación de todos los requisitos específicos para el lugar identificados en la Investigación de ingeniería geotécnica, los impactos relacionados con el agotamiento de suministros, o bien la interferencia con la recarga, de agua subterránea serían menos que significativos.

Además, el Lugar del proyecto se encuentra dentro de una "Zona de metano", tal como la designa el Departamento de Edificación y Seguridad de Los Ángeles (LADBS, *Los Angeles Department of Building and Safety*). Debido al posible riesgo ambiental relacionado con las Zonas de metano, especialistas en la materia llevaron a cabo una investigación sobre metano en el Lugar del proyecto el 19 de agosto de 2016. Los resultados de la investigación sobre metano se incluyen en la Declaración negativa, en la sección VIX "Riesgos y materiales peligrosos" que comienza en la página 60.

Como se analizó más ampliamente en la Declaración negativa, los especialistas en metano realizaron pruebas *in situ* con un sondeo superficial y también distintas profundidades el 18 y 19 de agosto de 2016 en el lugar. Basados en la tabla IA del Código de metano del LADBS, se encontraron niveles significativos de metano mientras se realizaban pruebas en este lugar. Por ende, según la tabla IA correspondiente a la Zona de metano, este Proyecto queda encuadrado bajo el Nivel de diseño IV, con menos de 2 pulgadas de presión de gas en la columna de agua. Por lo tanto, tal como se establece en la tabla IA del Código de metano, este proyecto requiere sistemas de mitigación de metano, tanto pasivos como activos.

El Proyecto deberá cumplir con los sistemas de mitigación de metano requeridos para los proyectos dentro del Nivel de diseño IV. En cumplimiento con las medidas normativas existentes para el Nivel de diseño IV, se podrían remediar los posibles impactos originados a partir de la construcción en una zona de metano y tales impactos serían menos que significativos.

Comentario 2:

Que la zona a construir juega un papel de pulmón natural en un medio ambiente altamente contaminado y falto de zonas verdes y esparcimiento.

Respuesta 2:

Consulte las respuestas 1 y 3 al correo electrónico N.° 1 incluidas anteriormente.

SOLICITUD PARA PROTEGER NUESTROS ESPACIOS VERDES EN LAFAYETTE PARK

Comentario 1:

Sin embargo también nos preocupa que las proyecciones de la agencia de servicios "HOLA" quiera expander sus programas y proyecto a costa de quitar espacios a dicho parque, privando con ello que muchos niños y jóvenes puedan tener un espacio de oxígeno en una zona escasa de zonas verdes.

Respuesta 1:

Consulte la respuesta 1 al correo electrónico N.° 1 incluida anteriormente.

Comentario 2:

Que como vecinos, sentimos que ha existido vicios en dicho proceso, ya que la comunidad no fue debidamente informada y la información fue escasa y enfocada en personas usuarias de programas de dicha agencia de servicio o nom profit de nombre "HOLA".

Respuesta 2:

Consulte la respuesta 2 al correo electrónico N.° 1 incluida anteriormente.

Comentario 3:

Que vemos no ha reflexionado sobre el alto impacto negativo en el medio ambiente, ya que se construiría un nuevo edificio en donde actualmente se encuentra una zona de arboles, llamada el "pequeño bosquecillo".

Respuesta 3:

Consulte la respuesta 3 al correo electrónico N.° 1 incluida anteriormente.

CARTA A LA DIVISIÓN DE SERVICIOS DE INGENIERÍA DE AGUAS RESIDUALES (OFICINA DE SANEAMIENTO DE LOS ÁNGELES); 5 DE JUNIO DE 2017.

Comentario 1:

La infraestructura de alcantarillas ubicada en la cercanía del proyecto propuesto incluye una línea existente de 10 pulgadas sobre la mano derecha de Wilshire Blvd. La alcantarilla de la línea existente de 10 pulgadas alimenta a la línea de 15 pulgadas ubicada sobre Westmoreland Ave antes de descargarse dentro de la línea de alcantarillas de 57 pulgadas sobre James M Wood Blvd. Basados en los caudales estimados, parece ser que el sistema de alcantarillas podría adaptarse al caudal total del proyecto propuesto.

Respuesta 1:

Este comentario es coherente con el análisis realizado en la sección XIX, Servicios públicos, de la Declaración negativa y, tal como allí se establece, la División de Servicios de Ingeniería de Aguas Residuales de la Oficina de Saneamiento de Los Ángeles ha determinado que la infraestructura de alcantarillas existentes puede servir al proyecto.

Comentario 2:

Se le ha encargado a la División de Protección de Cuencas (WPD, Watershed Protection Division) de la Oficina de Saneamiento de Los Ángeles la tarea de garantizar la implementación de los requisitos del Permiso municipal para aguas pluviales dentro de la ciudad de Los Ángeles; prevemos que serían aplicables los siguientes requisitos: requisitos de mitigación posterior a la construcción, calles verdes, requisitos de construcción.

Respuesta 2:

Tal como se analizó en la Declaración negativa, el proyecto cumplirá con todos los códigos y las reglamentaciones pertinentes.

Comentario 3:

El 22 de abril de 2016, el ayuntamiento de la ciudad de Los Ángeles aprobó la ordenanza N.° 184248 mediante la cual se modificaba el Código de Edificación de la Ciudad de Los Ángeles, por la cual se les exigía a los constructores que consideren la reutilización beneficiosa del agua subterránea como una medida de conservación y una alternativa a la práctica común de descargar dicha agua en el drenaje para tormentas (SEC. 99.04.305.4).

Respuesta 3:

Tal como se analizó en la Declaración negativa, el Proyecto no requeriría adiciones o extracciones directas de agua subterránea. Durante las perforaciones realizadas por Geotechnologies, Inc., como parte de la Investigación de ingeniería geotécnica, se encontraron filtraciones de agua subterránea a una profundidad de entre 10 y 16,5 pies por debajo de la superficie terrestre; el mayor nivel histórico alcanzado por el agua subterránea en el área es de aproximadamente 20 pies por debajo de la superficie terrestre. Hay presencia de limonita de la Formación Puente de la era del Mioceno debajo del lugar, a una profundidad del rango de entre 33 y 35 pies por debajo de la superficie terrestre existente. Se considera que el lecho rocoso de limonita no contiene agua y que posiblemente la filtración de agua subterránea que se encontró sea representativa de una condición de agua subterránea colgada sobre el lecho rocoso que no representa al nivel freático regional.

Se prevé realizar una excavación como parte del Proyecto para remover los suelos incompatibles y así servir como sustento para la construcción del desarrollo propuesto. Sin embargo, no se propone ningún nivel subterráneo como parte del Proyecto, por lo que no está previsto encontrar agua subterránea a partir de la excavación. La construcción del Proyecto propuesto deberá cumplir con el Código Uniforme de Edificación (UBC, *Uniform Building Code*) de la Ciudad de Los Ángeles y el Código de Edificación de California de 2010. En cumplimiento de las reglamentaciones actuales y con la implementación de todos los requisitos específicos para el lugar identificados en la Investigación de ingeniería geotécnica, los impactos relacionados con el agotamiento de suministros, o bien la interferencia con la recarga, de agua subterránea serían menos que significativos. Aun así, el Solicitante considerará la medida de conservación indicada en caso de que se encuentre agua subterránea.

Comentario 4:

La ciudad tiene un requisito estándar que se aplica a todos los desarrollos residenciales propuestos de cuatro o más unidades o cuando la adición de áreas de pisos sea del 25 por ciento o mayor, y para todos los demás proyectos de desarrollo en los que la adición de áreas de pisos sea del 30 por ciento o mayor. Dichos desarrollos deben tener reservada un área de reciclaje o bien una sala para actividades de reciclaje in situ.

Respuesta 4:

El solicitante cumplirá con este requisito y proporcionará un área para reciclaje *in situ*.